

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

The Staff of the Missouri Public Service Commission)	
)	
Complainant)	
v.)	
)	Case No. GC-2014-0216
Laclede Gas Company, d/b/a Missouri Gas Energy,)	
)	
and)	
)	
Southern Union Company, formerly doing business as Missouri Gas Energy)	
Respondent.)	

MOTION FOR EXTENSION OF TIME TO FILE ANSWER

COMES NOW Laclede Gas Company, doing business as Missouri Gas Energy (“MGE”) and files this Motion for Extension of Time To File Answer in this matter, stating as follows:

1. On February 7, 2014, the Commission issued its Notice of Complaint and Order Establishing Time to Respond (the “Order”). The Order directed the Respondents to answer, by March 10, 2014, a complaint filed by the Staff against the Respondents.
2. On or before March 10, 2014, MGE plans to file a motion to dismiss the Complaint or to hold it in abeyance pending reopening of the Investigation docket to permit a more complete and accurate development of the facts surrounding the incident at the Plaza on February 19, 2013.
3. However, Commission Rule 4 CSR 240-2.070(8) indicates that unless otherwise ordered, answers to complaints are to be filed within thirty (30) days of the date of notice.

4. Similar to the relief requested by Southern Union earlier today, MGE requests that the Commission extend MGE's obligation to file an answer until ten (10) days after the effective date of a Commission order ruling on MGE's motion. Because MGE's motion, if granted, would result in elimination or deferral of MGE's obligation to answer the Complaint, MGE avers that granting the extension requested herein will serve judicial economy and will not prejudice any party to this case.

WHEREFORE, MGE respectfully requests that the Commission issue its order extending the time for it to file an answer until ten (10) days after the effective date of an order ruling on the MGE motion described herein.

Respectfully submitted,

LACLEDE GAS COMPANY, d/b/a MISSOURI
GAS ENERGY

By: /s/ Todd J. Jacobs

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ATTORNEYS FOR RESPONDENT LACLEDE
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CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of March, 2014, a true and accurate copy of the foregoing was filed with the Missouri Public Service Commission electronically and also served electronically on the Staff of the Missouri Public Service commission and on the Office of the Public Counsel:

/s/ Rick Zucker