## NEWMAN, COMLEY & RUTH

PROFESSIONAL CORPORATION
ATTORNEYS AND COUNSELORS AT LAW
MONROE BLUFF EXECUTIVE CENTER
601 MONROE STREET, SUITE 301
P.O. BOX 537
JEFFERSON CITY, MISSOUR! 65102-0537

TELEPHONE: (573) 634-2266 FACSIMILE: (573) 636-3306

ROBERT K. ANGSTEAD MARK W. COMLEY CATHLEEN A. MARTIN STEPHEN G. NEWMAN JOHN A. RUTH D. GREGORY STONEBARGER ALICIA EMBLEY TURNER

December 29, 2000

The Honorable Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102-0360

Re:

Case No. GO-2000-394

FILED<sup>2</sup>
DEC 2 9 2000

Service Commission

Dear Judge Roberts:

Enclosed for filing please find the original and eight copies of a Motion for Extension of Time.

Would you please see that this filing is brought to the attention of the appropriate Commission personnel.

Thank you.

Sincerely,

NEWMAN, COMLEY & RUTH P.C.

By:

Mark W. Comley

MWC:ab Enclosure

cc:

Office of Public Counsel General Counsel's Office Michael C. Pendergast BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED<sup>3</sup>
DEC 2 9 2000

Missouri Public Service Commissio	_
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In the matter Laclede Gas Company's	)	
Experimental Price Stabilization Fund.	)	Case No. GO-2000-394

## MOTION FOR EXTENSION OF TIME

COMES NOW Laclede Gas Company ("Laclede" or "Company"), pursuant to 4 CSR 240-050(3) and 4 CSR 240-2.080 (16) of the Commission's Rules of Practice and Procedure, and respectfully requests that the Commission grant it an extension of time until January 5, 2001, in which to respond to the Staff Recommendation filed in the above-captioned case on December 22, 2000. In support thereof, Laclede states as follows:

- 1. On December 22, 2000, the Staff of the Public Service Commission of the State of Missouri ("Staff") filed a Recommendation in the above-captioned case in which it, among other things, recommended that the Commission terminate the third year of the Experimental Price Stabilization Program approved by the Commission in Case No. GO-98-484.
- 2. Because the normal ten day response time provided by Rule 4 CSR 240-2.080 (16) contains two weekends and two holidays, Laclede will have had only four full business days in which to review Staff's Recommendation and prepare its response before such response would otherwise be due. Given the importance of the issues raised by Staff's Recommendation, the need to consult various Company personnel in preparing the Company's response, and the time required to prepare a thorough and useful response,

Laclede believes that there is good cause for enlarging the time in which it must submit its response until January 5, 2001.

- 3. The extension requested herein will not prejudice any other party, but will instead serve to enhance the quality of the information available to the Commission as it evaluates Staff's Recommendation.
- 4. Laclede has contacted counsel for both the Staff and the Office of the Public Counsel and they have indicated that they have no objection to the extension requested herein.

Wherefore, for the foregoing reasons, Laclede respectfully requests that the Commission issue an Order granting Laclede an extension of time until January 5, 2001, in which to respond to the Staff Recommendation filed in this case on December 22, 2000.

Respectfully submitted,

Michael C. Pendergast #31763

Laclede Gas Company

Assistant Vice President and

Associate General Counsel

Laclede Gas Company

720 Olive Street, Room 1520

St. Louis, MO 63101

(314) 342-0532 Phone

(314) 421-1979 Fax

## **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Motion for Extension of Time has been duly served upon the General Counsel of the Staff of the Public Service Commission, Office of the Public Counsel and all parties of record to this proceeding by hand delivery, on this 29 day of December, 2000.