

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

In the Matter of Laclede Gas Company's) **Case No. GR-2014-0121**
PGA Filing)

**MOTION FOR EXTENSION OF TIME
TO RESPOND TO STAFF RECOMMENDATION**

COMES NOW Laclede Gas Company ("Laclede" or "Company") and, pursuant to Rule 4 CSR 240-2.050(3) of the Commission's Rules of Practice and Procedure, respectfully requests that the Commission extend the time for Laclede to respond to the Staff Recommendation in this case. In support thereof, Laclede states as follows:

1. On December 19, 2014, Staff filed its Recommendation to Adjust ACA Balances ("Staff Recommendation") in this case. On December 30, the Commission issued an order directing Laclede to respond to the Staff Recommendation by February 2, 2015.

2. The Staff Recommendation covers various matters, including proposed disallowances based on two separate issues. Staff's proposed disallowances were conditioned upon its allegation that Staff had not yet received what it considered to be reasonable justification from Laclede regarding certain pipeline capacity reservations. After reviewing the Staff Recommendation, Laclede arranged a conference call with Staff on January 16, 2015 to discuss the proposed disallowances, and more specifically, Staff's needs for reasonable justification.

3. The parties intend to review information to be provided by Laclede and meet again in February in an effort to resolve the proposed disallowances, and possibly other issues raised in the Staff Recommendation. To provide additional time to conduct

such discussion and determine if some or all of the outstanding issues can be resolved, Laclede, with the concurrence of Staff, requests a 30 day extension of the time for Laclede to respond to the Staff Recommendation while the parties concentrate on these efforts.

4. Laclede therefore proposes an extension to March 4, 2015 to respond to the Staff Recommendation. As indicated above, Laclede believes the requested extension will give the parties an opportunity to narrow the issues raised in the Staff Recommendation. Staff has agreed to the proposed extension, and Public Counsel has indicated that it does not object thereto.

WHEREFORE, for the foregoing reasons, Laclede respectfully requests that the Commission grant this motion and extend the time for Laclede to respond to the Staff Recommendation in this case to March 4, 2015.

Respectfully submitted,

/s/ Rick Zucker

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion has been duly served upon the General Counsel of the Staff of the Public Service Commission and the Office of the Public Counsel by hand delivery, email, fax, or United States mail, postage prepaid, on this 29th day of January, 2015.

/s/ Marcia Spangler

Marcia Spangler