

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

The Staff of the Missouri Public)	
Service Commission,)	
)	
Complainant,)	
)	
v.)	Case No. GC-2006-0491
)	
Missouri Pipeline Company, LLC; and)	
Missouri Gas Company, LLC,)	
)	
Respondents.)	

MOTION TO LATE FILE STATEMENT OF POSITIONS

COMES NOW, the Municipal Gas Commission of Missouri ("MGCM") and for its Motion to Late File Statement of Positions states as follows:

1. As a result of inclement weather the end of last week, counsel for MGCM was prevented from contacting its client regarding approval of the positions taken in its Statement of Positions. As such, counsel was precluded from timely filing its Statement of Positions.

2. Permitting MGCM to late file its Statement of Positions will not prejudice any parties to this case.

WHEREFORE, MGCM respectfully requests that the Commission accept its late-filed Statement of Positions in this case.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "David L. Woodsmall". The signature is written in a cursive, flowing style. It is positioned above a horizontal line that spans the width of the text block below it.

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**Attorneys for the Municipal Gas
Commission of Missouri**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the forgoing pleading by email, facsimile or First Class United States Mail to all parties by their attorneys of record as provided by the Secretary of the Commission.

A handwritten signature in black ink, appearing to read "David L. Woodsmall", is written over a horizontal line. A vertical red line is positioned to the right of the signature.

David L. Woodsmall

Dated: December 4, 2006