

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

In the Matter of Laclede Gas Company's)	Case No. GR-2007-0208
Tariff to Revise Natural Gas Rate Schedules)	

In the Matter of the Application of Laclede)	
Gas Company for an Accounting Authority Order)	
Authorizing the Company to Defer for Future Recovery)	Case No. GU-2007-0137
the Costs of Complying With the Emergency)	
Amendment to the Commission's Cold Weather Rule)	

MOTION TO CONSOLIDATE

COMES NOW Laclede Gas Company (hereinafter "Laclede" or "Company"), pursuant to 4 CSR 240-2.110(3) and 4 CSR 240-13.055(14)G.2, and on behalf of all of the parties to the above referenced cases, submits this Motion to Consolidate Case No. GU-2007-0137 with Case No. GR-2007-0208 and waive the requirement for a separate proceeding under the provisions of subsection (14)G.2 of 4 CSR 240-13.055. In support thereof, Laclede states as follows:

1. On December 7, 2006, the Commission issued an accounting authority order in Case No. GU-2007-0137 in which it granted Laclede authority to defer for future recovery the costs incurred by the Company to comply with the Commission's Emergency Amendment to the Cold Weather Rule.

2. The costs being deferred in connection with the accounting authority order granted in Case No. GU-2007-0137 relate to the same winter period that is also included in the test year being used to establish rates in Laclede's current general rate case proceeding, Case No. GR-2007-0208. As a result of this overlap, Case Nos. GU-2007-0137 and GR-2007-0208 are pending actions that "involve related questions of law or fact" within the meaning of Commission Rule 4 CSR 240-2.110(3). Since that rule provides for the joint hearing of such common matters, Laclede believes that these two cases should be consolidated so that such costs can be reviewed and their recovery addressed in the testimony and hearings held in Case No.

GR-2007-0208. In addition to allowing the parties to use their limited resources more efficiently by avoiding the need to conduct separate proceedings in Case No. GU-2007-0137, such an approach is also consistent with the recovery provisions of the Commission's Emergency and Permanent Amendments to the Cold Weather Rule which require such deferred costs to be recovered through the rates established in general rate case proceedings.

3. Counsel for Laclede has submitted this Motion to counsel for the other parties to these two cases and has been advised by all that they have no objection to the relief sought herein, including waiver of the requirement for a separate proceeding under the provisions of subsection (14)G.2 of 4 CSR 240-13.055.

WHEREFORE, for the foregoing reasons, Laclede respectfully requests that the Commission issue its Order consolidating Case No. GU-2007-0137 with Case No. GR-2007-0208 and waiving the requirement for a separate proceeding under the provisions of subsection (14)G.2 of 4 CSR 240-13.055 so that the costs deferred by Laclede in connection with the accounting authority order granted in Case Nos. GU-2007-0137 can be reviewed and their recovery addressed in the testimony and hearings held in Case No. GR-2007-0208.

Respectfully Submitted,

/s/ Michael C. Pendergast

Michael C. Pendergast, Mo. Bar 31763
Vice President and Associate General Counsel
Rick Zucker, Mo. Bar 49211
Assistant General Counsel – Regulatory

Laclede Gas Company
720 Olive Street, Room 1520
St. Louis, MO 63101
Telephone: 314.342.0532
Facsimile: 314.421.1979
Email: mpendergast@lacledegas.com
rzucker@lacledegas.com

Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing pleading was served on all parties of record on this 8th day of March 2007 by United States mail, hand-delivery, email, or facsimile.

/s/ Gerry Lynch _____