BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Southern Union Company)	
d/b/a Missouri Gas Energy's)	File No. GE-2011-0282
Application for Waiver/Variance.)	

MOTION TO EXTEND PROCEDURAL SCHEDULE

Comes now Southern Union Company d/b/a Missouri Gas Energy ("MGE" or "Company"), and, as its Motion to Extend Procedural Schedule, states as follows to the Missouri Public Service Commission ("Commission"):

- 1. The Commission previously established a procedural schedule in this matter that next calls for the filing of surrebuttal testimony and cross-surrebuttal testimony by January 12, 2012. There have been discussions among the parties concerning outcomes that would make the hearing of this case unnecessary.
- 2. Accordingly, MGE, with the support of counsel for the Staff of the Commission ("Staff") and the Office of the Public Counsel ("Public Counsel"), 1 requests that the procedural schedule events in this matter be extended by approximately 45 days (weekend/holidays may require new dates that are slightly less or slightly more than 45 days) to allow the referenced discussions to run their course.
- 3. A grant of this motion will allow the parties to focus on issues that may lead to a conclusion of this case and may result in administrative efficiency for the Commission.
- 4. The requested extension would result in the following dates for the remaining procedural events:

Surrebuttal Testimony from Missouri Gas Energy	February 27, 2012
Cross-Surrebuttal Testimony from Staff and Public	February 27, 2012

Ms. Shemwell (Staff) and Mr. Poston (Public Counsel).

1

Counsel	
Issues List, Witness List, Order of Witnesses, Order of Opening Statements	March 5, 2012
Position Statements	March 16, 2012
Stipulation of Undisputed Material Facts	March 21, 2012
Evidentiary Hearing	April 11-12, 2012
Simultaneous Post-Hearing Briefs	May 11, 2012
Proposed Findings of Fact and Conclusions of Law	May 16, 2012

WHEREFORE, MGE respectfully requests that the Commission issue its order extending the procedural schedule in the manner described herein.

Respectfully submitted,

Dean L. Cooper MBE #36592

BRYDON, SWEARENGEN & ENGLAND P.C.

312 E. Capitol Avenue

P. O. Box 456

Jefferson City, MO 65102

Phone: (573) 635-7166 Fax: (573) 634-3847 dcooper@brydonlaw.com

Todd J. Jacobs

MBE #52366

Senior Attorney

Missouri Gas Energy

3420 Broadway

Kansas City, MO 64111

816-360-5976

816-360-5903 (fax)

Todd.Jacobs@sug.com

ATTORNEYS FOR MISSOURI GAS ENERGY

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 9^{th} day of January, 2012, to the following:

Lera Shemwell Missouri Public Service Commission <u>lera.shemwell@psc.mo.gov</u> Marc Poston
Office of the Public Counsel
marc.poston@ded.mo.gov

D1.Com