

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

In the Matter of Missouri Gas Utility, Inc.'s) **File No. GR-2010-0129**
Purchased Gas Adjustment) Tariff No. YG-2010-0302

In the Matter of Missouri Gas Utility, Inc.'s) **File No. GR-2009-0306**
Purchased Gas Adjustment)

MGU'S MOTION TO CONSOLIDATE

Comes now Missouri Gas Utility ("MGU"), and, for its Motion to Consolidate, states as follows to the Missouri Public Service Commission ("Commission"):

SUMMARY

MGU seeks to consolidate the file containing its October 29, 2010 PGA/ACA filing (File No. GR-2010-0129) with the file containing its prior 2008-2009 PGA filing (File No. GR-2009-00306). These matters contain common questions of law or fact and consolidation would avoid unnecessary costs or delay.

FILES

1. On October 29, 2009, MGU submitted to the Commission revised tariff sheets with a proposed effective date of November 13, 2009, for the purpose of making its Purchased Gas Adjustment (PGA) (Tracking No. YG-2010-0302). MGU further filed these tariff sheets and its Actual Cost Adjustment (ACA) information on the same date in a new file (File No. GR-2010-0129) and served the materials on the Staff and the Office of the Public Counsel.

2. MGU had previously made a PGA filing on February 26, 2009, that had been identified as File No. GR-2009-0306.

CONSOLIDATION

3. Commission Rule 4 CSR 240-2.110(3) states that “[w]hen pending actions involve related questions of law or fact, the commission may order a joint hearing of any or all the matters at issue, and may make other orders concerning cases before it to avoid unnecessary costs or delay.” The Commission has previously stated that Commission Rule 4 CSR 240-2.110(3) allows the Commission to consolidate pending actions involving related questions of law or fact. See *In the Matter of Highway H Utilities, Inc.*, Order Consolidating Cases, Case No. WA-2009-0316, 2009 Mo. PSC LEXIS 431 (May 19, 2009).

RELATED QUESTIONS OF LAW OR FACT

4. The Commission Staff has indicated its belief that the matters filed in File No. GR-2010-0129 should have been filed in File No. GR-2009-0306. The two files therefore contain related questions of law or fact.

5. The difference is purely administrative (a different file number) and would not change the underlying tariff filing or other the substance of this filing. MGU suggests that consolidation of the two cases would avoid unnecessary costs or delay.

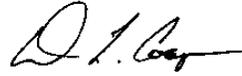
6. For this reason, there are related questions of law or fact and judicial economy will be served by consolidating these cases.

7. Staff counsel has indicated that he has no objection to this proposed consolidation.

WHEREFORE, MGE respectfully requests that the Commission consolidate Files

No. GR-2010-0129 and GR-2009-0306, with GR-2009-0306 being the lead matter.

Respectfully submitted,



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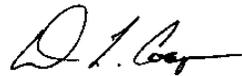
ATTORNEYS FOR MISSOURI GAS UTILITY

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 3rd day of November, 2009, to:

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