

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

In the Matter of the Application of)	
Missouri Gas Energy for the)	
Issuance of an Accounting Authority)	
Order Relating to its Natural Gas)	Case No. GU-2011-0392
Operations and for a Contingent)	
Waiver of the Notice Requirement)	
Of 4 CSR 240-4.020(2))	

**PROPOSED PROCEDURAL SCHEDULE AND REQUEST TO CANCEL
PREHEARING CONFERENCE**

COMES NOW, Southern Union Company, d/b/a Missouri Gas Energy ("MGE" or "Company"), and, on behalf of MGE, the Staff ("Staff") of the Missouri Public Service Commission ("Commission") and the Office of the Public Counsel ("Public Counsel"), states as follows:

1. The Commission's September 20, 2011 Order Directing Filing directed the parties to file available dates for a pre-hearing conference to convene between October 3 and 13, 2011. The parties proposed October 6, 2011, at 1:00 p.m., and the Commission, thereafter, issued its order setting that date for a prehearing conference.

2. Subsequently, the parties have discussed and come to an agreement as to a proposed procedural schedule for this matter. The following table identifies the agreed to events and dates, as well as two proposed conditions related to discovery:

DIRECT TESTIMONY (MGE)	October 11, 2011
REBUTTAL TESTIMONY (Staff / OPC)	November 1, 2011
SURREBUTTAL TESTIMONY (MGE) CROSS-SURREBUTTAL (Staff / OPC)	November 15, 2011
LIST OF ISSUES, ORDER OF	November 17, 2011

WITNESSES, ETC.	
STATEMENTS OF POSITION	November 22, 2011
EVIDENTIARY HEARING	November 30 - December 1, 2011
BRIEFS	December 19, 2011

- For data requests served after filing of direct testimony and prior to the filing of rebuttal testimony, the response time for all data requests shall be 10 calendar days and 5 business days to object or notify that more than 10 calendar days will be needed to provide the requested information.
- For data requests served after filing of rebuttal testimony, the response time for all data requests shall be 5 calendar days and 3 business days to object or notify that more than 5 calendar days will be needed to provide the requested information.

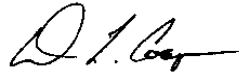
3. Moreover, the parties request that the Commission waive 4 CSR 240-2.045(2) and 2.080(11) with respect to prefiled testimony and other pleadings, and treat filings made through the Commission's Electronic Filing and Information System (EFIS) as timely filed if filed before midnight on the date the filing is due.

4. Because the parties have reached agreement as to the matters contained herein, they therefore request that the Commission cancel the prehearing conference currently scheduled for October 6, 2011, so that they may instead focus on the agreed to events.

WHEREFORE, MGE, Staff and the Public Counsel respectfully request that the Commission issue its order adopting the schedule proposed herein and cancel the

prehearing conference currently scheduled for October 6, 2011.

Respectfully submitted,



Dean L. Cooper, MBE #36592
L. Russell Mitten, MBE #27881
Brydon, Swearngen, and England P.C.
P.O. Box 456
Jefferson City, MO 65102
(573) 635-7166
(573) 634-7431 (fax)
dcooper@brydonlaw.com
rmitten@brydonlaw.com

Todd J. Jacobs, MBE # 52366
Senior Attorney
Missouri Gas Energy
3420 Broadway
Kansas City, MO 64111
(816) 360-5976
(816) 360-2903 (fax)
todd.jacobs@sug.com

ATTORNEYS FOR MISSOURI GAS ENERGY

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail to the following counsel this 29th day of September, 2011:

Bob Berlin
Missouri Public Service Commission
Governor's Office Building
Jefferson City, Missouri 65102
bob.berlin@psc.mo.gov
gencounsel@psc.mo.gov

Marc Poston
Governor's Office Building
200 Madison Street
Jefferson City, Missouri 65102
marc.poston@ded.mo.gov
opcservice@ded.mo.gov

