

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

The Staff of the Missouri Public Service Commission)	
)	
)	
Complainant)	
)	
v.)	Case No. GC-2014-0216
)	
Laclede Gas Company, d/b/a Missouri Gas Energy,)	
)	
and)	
)	
Southern Union Company, formerly doing business as Missouri Gas Energy)	
)	
)	
Respondent.)	

MOTION FOR EXTENSION OF TIME

COMES NOW Southern Union Company (Southern Union), by way of its successor, Panhandle Eastern Pipe Line Company, LP (Panhandle), by and through counsel, and, as a part of its special appearance as an interested person for the sole, limited and specific purpose of contesting jurisdiction and bringing forward to the Missouri Public Service Commission (Commission) certain facts concerning Southern Union, moves the Commission to extend the date for any obligation Southern Union or its successor may have to file an answer in this matter:

1. On February 6, 2014, the Commission’s Staff filed a complaint naming as respondents both “Laclede Gas Company, d/b/a Missouri Gas Energy” (Laclede), and “Southern Union Company, formerly doing business as Missouri Gas Energy”. On

February 7, 2014, the Commission issued its Notice of Complaint and Order Establishing Time to Respond (Commission's Order). Among other things, the Commission's Order directed that "Southern Union Company" file its answer to the Complaint by March 10, 2014.

2. On or before March 10, 2014, Panhandle plans to file a Motion to Dismiss on jurisdictional grounds suggesting that Southern Union no longer exists,¹ is not a Commission-regulated public utility and is no longer subject to the Commission's jurisdiction.

3. Commission Rule 4 CSE 240-2.070(8) indicates that answers to complaints are to be filed within thirty (30) days of the date of notice, "unless otherwise ordered."

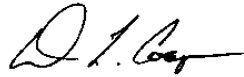
4. Because of the issues regarding jurisdiction and party identity to be raised in Panhandle's Motion to Dismiss, Panhandle moves the Commission to extend any obligation to file an answer that it may be perceived to have until ten (10) after the effective date of a Commission order ruling on such Motion to Dismiss. Addressing the issues raised by the Motion to Dismiss prior to requiring the filing of answer will serve judicial economy and should not prejudice the parties at this stage of the matter.

WHEREFORE, Panhandle respectfully requests that the Commission issue its order extending the time for Southern Union or its successor to file an answer until ten (10) days

¹ Effective January 10, 2014, Southern Union ceased to exist as a separate corporate entity, having been merged into Panhandle Eastern Pipe Line Company, LP, with Panhandle being the surviving entity.

after the effective date of an order ruling on Panhandle's Motion to Dismiss, as long as such Motion to Dismiss is filed on or before March 10, 2014.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, hand-delivered, or sent via electronic mail on this 6th day of March, 2014, to all parties of record in this case.

