

**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.)	

MGE'S PROPOSED PROCEDURAL SCHEDULE

COMES NOW, Southern Union Company, d/b/a Missouri Gas Energy ("MGE" or "Company"), and, as its proposed procedural schedule, states as follows to the Missouri Public Service Commission ("Commission"):

1. On March 4, 2011, MGE filed a Notice of Intended Case Filing, wherein it stated its intent to seek a waiver or variance concerning a condition imposed as a result of the Commission's "Order Approving Stipulation and Agreement and Approving Application" issued in Case No. GM-2003-0238. Thereafter, on June 29, 2011, MGE filed its application herein.

2. On August 19, 2011, the Office of the Public Counsel ("Public Counsel") filed a motion for summary determination requesting the Commission deny MGE's application. On August 25, 2011, the Commission's Staff filed its recommendation, as well as suggestions supporting Public Counsel's motion. On September 19, 2011, MGE responded to Staff's Recommendation and the Public Counsel Motion and made its own motion for summary determination.

3. The Commission's September 28, 2011 Notice of Contested Case, Order Denying Motions for Summary Determination and Directing Filing, among other things, directed that "no later than October 13, 2011, the parties shall jointly file a proposed procedural schedule."

4. The parties have discussed potential procedural schedules, but have not been able to reach an agreement as to a schedule. Accordingly, MGE is filing its proposal for the Commission's consideration.

5. MGE's proposal is based on the fact that, depending on the outcome, a decision may have an impact on MGE's 2011 financial statements. For such a decision to have import as to those statements, MGE seeks a decision by mid-February 2012. Accordingly, MGE would like to be able to present the case to the Commission by February. Further, as a result of the application, Staff recommendation, Public Counsel Motion and MGE response (including its affidavit), MGE believes that it is unlikely that "new" facts or theories will be discovered during the testimony filing portion of this procedure.

6. The following table identifies MGE's proposed schedule, as well as two proposed conditions related to discovery, designed to facilitate the proposed testimony dates:

DIRECT TESTIMONY (MGE)	October 27, 2011
REBUTTAL TESTIMONY (Staff / OPC)	November 22, 2011
SURREBUTTAL TESTIMONY (MGE)	December 15, 2011
LIST OF ISSUES, ORDER OF WITNESSES, ETC.	December 20, 2011
STATEMENTS OF POSITION	January 4, 2011
EVIDENTIARY HEARING	January 10-11, 2012 (transcripts to be requested for delivery in one week)
BRIEFS	January 31, 2012

- 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

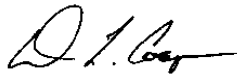
calendar days and 5 business days to object or notify that more than 10 calendar days will be needed to provide the requested information.

- 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.

7. Moreover, MGE requests 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.

WHEREFORE, MGE respectfully requests that the Commission issue its order adopting the schedule and conditions proposed herein

Respectfully submitted,



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ATTORNEYS FOR MISSOURI GAS ENERGY

CERTIFICATE OF SERVICE

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