

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

In the matter of the Joint Application of Southern Missouri )  
Gas Company, L.P. d/b/a Southern Missouri Natural Gas )  
And Missouri Gas Utility, Inc., for Approval of the ) File No. GM-2011-0354  
Merger of Southern Missouri Natural Gas with Missouri )  
Gas Utility, Inc., and for Certain Related Transactions. )

**MOTION FOR LEAVE TO FILE PROPOSED PROCEDURAL SCHEDULE**

COME NOW Southern Missouri Gas Company, L.P. d/b/a Southern Missouri Natural Gas (SMNG) and Missouri Gas Utility, Inc. (MGU), by and through their undersigned counsel, and, on behalf of; the Staff of the Missouri Public Service Commission; the Office of the Public Counsel and Southern Union Company, d/b/a Missouri Gas Energy, state as follows to the Missouri Public Service Commission (Commission):

1. The Commission's May 31, 2011, Order Granting Intervention and Setting Prehearing Conference set this matter for a prehearing conference on June 13, 2011, and directed that the parties file a proposed procedural schedule no later than June 20, 2011.

2. A prehearing conference was held as scheduled on June 13, 2011. As a result of the parties' discussions at the prehearing conference, the parties have agreed to recommend the following procedural schedule:

Informal Staff Recommendation (provided to parties only)	August 12, 2011
Settlement Conference	August 16 – 18, 2011
Rebuttal Testimony	August 26, 2011
Surrebuttal Testimony	September 12, 2011
List of Issues, Proposed Order of Witnesses, Opening Statements and Cross-examination	September 13, 2011

Statements of Position	September 15, 2011
Evidentiary Hearing	September 19, 20 and 22, 2011 <sup>1</sup>
Posthearing Briefs	October 19, 2011

3. The parties also agree to the following matters and request that this agreement be reflected in the Commission's order setting the procedural schedule:

- In regard to any data requests received after the filing of the proposed procedural schedule, data request responses will be due within ten calendar days of receipt of the subject data request, and any objection or request for extension shall be provided within five business days of receipt of the subject data request.
- Any party pre-filing testimony shall serve all work-papers related to such testimony electronically upon all other parties no later than two business days after the filing of such testimony.
- Staff shall draft in co-operation with the other parties, and file, a list of issues. Every other party shall either join in Staff's list of issues or separately file a list of issues. The format requirements set forth in 4 CSR 240-2.080 (21) are waived.

4. While the proposed procedural schedule was due on June 20, 2001, the parties were unable to obtain all parties' approval of the pleading by close of business on that date. This pleading is being filed one day out of time and MGU hereby moves the Commission for leave to file the proposed procedural schedule.

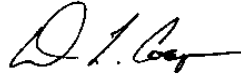
**WHEREFORE**, MGU and SMNG respectfully request that the Commission consider this pleading, grant the motion for leave, consider this pleading to comply with the Commission's Order Granting Intervention and Setting Prehearing Conference and, thereafter,

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<sup>1</sup> If not completed on September 20, the hearing will be postponed until September 22, to allow for participants to attend the FRI fall symposium.

issue such orders as the Commission believes to be reasonable and just.

Respectfully submitted,



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ATTORNEYS FOR MISSOURI GAS UTILITY, INC.

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ATTORNEYS FOR SOUTHERN MISSOURI  
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**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail or by U.S. Mail, postage prepaid, on June 21, 2011, to the following:

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