BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Laclede Gas Company's) Purchased Gas Adjustment for 2006-2007) <u>Case No. GR-2008-0140</u>

REQUEST FOR EXTENSION OF TIME TO FILE RESPONSE

COMES NOW Laclede Gas Company (hereinafter "Laclede" or "Company") and in support of its Request for Extension of Time to file Response, states as follows:

1. On December 31, 2008, the Staff of the Missouri Public Service Commission (hereinafter the "Staff") submitted its Memorandum and Recommendation in this case for the Company's 2006-2007 Actual Cost Adjustment ("ACA") period. On January 5, 2009, the commission issued an order directing Laclede to file a response to the Staff Recommendation by February 5, 2009. For the reasons stated below, Laclede requests a 30-day extension to file its response.

2. In its filing, the Staff makes a host of recommendations relating to various gas supply matters and proposes two adjustments to Laclede's ACA balances. Specifically, under the heading Reliability Analysis and Gas Supply Planning, Staff has identified 10 separate topics, some of them with multiple subparts. Under Hedging, the Staff lists seven separate matters to address. Further, the Staff has identified two new disallowances arising out of transactions between Laclede and its affiliate, LER.

3. The gas supply personnel who must assist in responding to these voluminous recommendations are at the same time engaged in (i) managing gas supply for our customers during the winter heating season; (ii) assisting in responding to discovery requests associated with ACA disallowances in the 2004-05 and 2005-06

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cases; and (iii) preparing responses to discovery requests for the ACA year just completed, 2007-08.

4. This is the first extension of time requested by Laclede. The Company believes that an extension of approximately 30 days would be sufficient to complete the process of filing a response to the many recommendations in this case. Laclede accordingly requests that the due date for its Response to Staff's Memorandum and Recommendation be extended to March 5, 2009.

5. Laclede has discussed this extension with counsel for both the Staff and the Office of the Public Counsel and they have indicated that they take no position regarding the requested relief.

WHEREFORE, for the foregoing reasons, Laclede respectfully requests that the Commission extend the due date for the filing of its Response to Staff's Memorandum and Recommendation in this case until March 5, 2009.

Respectfully submitted,

/s/ Michael C. Pendergast Michael C. Pendergast, Mo. Bar #31763 Vice President and Associate General Counsel Rick Zucker, Mo. Bar #49211

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CERTIFICATE OF SERVICE

Gerry Lynch hereby certifies that the foregoing pleading has been duly served upon the General Counsel of the Staff of the Public Service Commission and the Office of the Public Counsel by hand delivery, email, fax, or United States mail, postage prepaid, on this 4th day of February, 2009.

> <u>/s/ Gerry Lynch</u> Gerry Lynch