

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

Staff of the Missouri Public Service Commission)	
)	
)	
Complainant,)	
)	
v.)	Case No. GC-2006-0378
)	
Missouri Pipeline Company, LLC;)	
Missouri Gas Company, LLC; Omega)	
Pipeline Company, LLC; Mogas Energy,)	
LLC; United Pipeline Systems, Inc.; and)	
Gateway Pipeline Company, LLC)	
)	
Respondents.)	

**RESPONDENTS' RESPONSE TO STAFF'S MOTION
TO HOLD CASE IN ABEYANCE**

Respondents, Missouri Pipeline Company (hereafter "MPC") and Missouri Gas Company (hereafter "MGC") hereby submit their Response to Staff's Motion to Hold Case in Abeyance Pending the Resolution of Case No. GC-2006-0491 or in the Alternative Delay the Date for Filing Direct Testimony and Motion for Expedited Treatment, filed October 30, 2006 (hereafter "Staff's Motion").

1. Respondents vehemently disagree with each of Staff's allegations and legal reasoning in support it's Motion, but nevertheless support suspending the procedural schedule in its entirety as proposed by Staff in this proceeding until after the completion of Case No. GC 2006-0491 proceeding,

2. Respondents have produced thousands of pages of documents in response to Staff's discovery in the pending complaints and have made available four witnesses on eight days for Staff depositions. Respondents agree that a tremendous amount of resources have been expended on these proceedings and that further resources should not

be spent on Case No. GC-2006-0378 if Staff, the Complainant, wishes to pursue the completion of Case No. GC 2006 -0491 before pursuing Case No. GC 2006-0378 further.

3. Respondents concur with Staff that, at this point, focusing on the resolution of Case No. GC-2006-0491 is the best use of the parties' resources. Accordingly, Staff's request to hold Case No. GC-2006-0378 in abeyance in its entirety pending resolution of Case No. GC-2006-0491 is appropriate.

4. Respondents oppose Staff's alternative request to only to delay the Staff's deadline for filing its direct testimony until sometime after December 10, 2006, without any other modification of the procedural schedule. Simply delaying Staff's deadline by approximately 40 days with no extension in the procedural schedule for all other stages and hearing dates would materially prejudice Respondents and dramatically inhibit their ability to prepare their case to the point of denying Respondents due process. A December 10, 2006, Direct Testimony deadline would not leave sufficient time for Respondents and Interveners to conduct discovery and prepare their Rebuttal Testimony and Surrebuttal Testimony, particularly because the case involves complicated cost of service issues.

WHEREFORE, Respondents support Staff's request to hold Case No. GC-2006-0378 in abeyance, in its entirety, pending final resolution of Case No. GC-2006-0491. Respondents oppose Staff's alternative request to delay the filing deadline for its Direct Testimony until sometime after December 10, 2006.

Respectfully submitted,

LATHROP & GAGE, L.C.

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Attorneys for Respondents

Dated: November 3, 2006

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing Respondents' Response To Staff's Motion To Hold Case In Abeyance, has been transmitted by e-mail or mailed, First Class, postage prepaid, this 3rd day of November, 2006, to:

Case No. GC-2006-0378

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