

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

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|----------------------|---|-----------------------|
| USW Local 11-6 |) | |
| |) | |
| Complainant, |) | |
| |) | |
| v. |) | |
| |) | Case No. GC-2006-0390 |
| Laclede Gas Company, |) | |
| |) | |
| |) | |
| Respondent. |) | |

**STAFF'S RESPONSE TO USW LOCAL 11-6'S MOTION TO FILE TESTIMONY OUT
OF TIME**

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and respectfully submits as follows:

1. On September 26, 2006, USW Local 11-6 filed its Direct Testimony on the due date.
2. USW Local 11-6's Direct Testimony consists of the testimony of approximately 25 witnesses.
3. On October 23, 2006, USW Local 11-6 filed the Testimony of Mary Hall and asks the Commission for leave to file this Testimony out of Time.
4. Staff has no objection to this request and does not request additional time to respond to it.
5. However, Staff does reserve any potential objections to this testimony, including relevancy, until the Hearing in this case.

WHEREFORE, Staff respectfully submits Staff's Response to USW Local 11-6's Request to File Testimony Out of Time.

Respectfully submitted,

/s/ Robert V. Franson

Robert V. Franson

Senior Counsel

Missouri Bar No. 34643

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 27th day of October, 2006.

/s/ Robert V. Franson