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

In the Matter of Laclede Gas Company's	)	Case No. GR-2010-0171
Tariff to Revise Natural Gas Rate Schedules	)	

## STAFF'S RESERVATION OF RIGHTS

**COMES NOW** the Staff of the Missouri Public Service Commission and for its clarification of reservation of rights concerning discovery, states the following:

- 1. On July 28, 2010, the Parties to this case filed a Motion to Suspend Procedural Schedule, noting that an agreement in principle had been reached that, together with the Partial Stipulation and Agreement filed on July 23, 2010, would resolve all issues in this case.
- 2. On July 29, 2010, the Commission issued its Order Suspending the Procedural Schedule and Hearing, Order Directing Filing and Notice of On-the-Record Proceeding, in which it suspended the procedural schedule and hearing, directed the parties to file the Stipulation and Agreement reflecting their agreement in principle by August 3, 2010, and scheduled an on-the-record presentation to consider the Stipulation on August 4, 2010.
- 3. Staff agrees with Laclede that discovery in this case has been suspended, pending Commission approval of the Second Stipulation and Agreement.
- 4. Staff agrees with Laclede that Commission approval of the Second Stipulation will end Staff's discovery efforts in this case.
- If the Commission does not approve the Second Stipulation in full, Staff's discovery will resume.

- 6. Staff reserves the right to seek discovery in any current case or subsequent case on any discovery issues, including issues identical to those resolved in this case.
- 7. Accordingly, Staff agrees with Laclede that neither party waives its rights to pursue discovery of any issue in any current or subsequent case.

WHEREFORE, for the foregoing reasons, the Staff respectfully requests the Commission take note of Staff's Notice of Reservation of Rights.

Respectfully submitted,

## /s/ Lera L. Shemwell

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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 30<sup>th</sup> day of July, 2010.

/s/ Lera L. Shemwell