

Commissioners

SHEILA LUMPE Chair

CONNIE MURRAY KELVIN L. SIMMONS

STEVE GAW

## Missouri Public Service Commission

POST OFFICE BOX 360 JEFFERSON CITY, MISSOURI 65102 573-751-3234 573-751-1847 (Fax Number) http://www.psc.state.mo.us

June 14, 2001

WESS A. HENDERSON Director, Utility Operations

ROBERT SCHALLENBERG Director, Utility Services

DONNA M. KOLILIS Director, Administration

DALE HARDY ROBERTS Secretary/Chief Regulatory Law Judge

> DANA K. JOYCE General Counsel

FILED<sup>3</sup>
JUN 1 4 2001

nalyan

Mr. Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102

Missouri Public Service Commission

RE: Case No. GM-2001-342

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a UNANIMOUS MOTION TO EXTEND TIME TO FILE POSITION STATEMENTS, LIST AND ORDER OF WITNESSES AND ORDER OF CROSS-EXAMINATION.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Cliff Elshodgrass Senior Counsel

(573) 751-3966

(573) 751-9285 (Fax)

CES:sw Enclosure

cc: Counsel of Record

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



In the Matter of the Application of Laclede Gas Company for an Order	)	Missouri Public Service Commission
Authorizing Its Plan to Restructure Itself Into a Holding Company, and Unregulated	)	Case No. GM-2001-342
Subsidiaries.	)	

## <u>UNANIMOUS MOTION TO EXTEND TIME TO FILE POSITION STATEMENTS, LIST AND ORDER OF</u> <u>WITNESSES AND ORDER OF CROSS-EXAMINATION</u>

Comes now the Staff of the Missouri Public Service Commission (Staff) in behalf of all parties to the above case, and for its Motion to Extend Time to File Position Statements,

List and Order of Witnesses and Order of Cross-Examination, states the following:

- 1. On April 10, 2001, the Commission entered an Order Modifying the previous Procedural Schedule in this case. Pursuant to that modification, the Commission directed the parties to file their position statements, list and order of witnesses and order of cross-examination on June 18, 2001.
- 2. After the above Order was entered the parties entered into settlement negotiations and have expressed a desire to memorialize settled issues in a Partial Stipulation and Agreement to narrow the issues for hearing. The parties need additional time to draft the Partial Stipulation and Agreement for presentation to the Commission and also perhaps present a revised list of issues. In addition, Staff Witness Ron Bible is unable to participate in drafting Staff's position statement because he is out of state on National Guard duty until June 18, 2001.

- 3. Staff has contacted all the parties and they all support the extension of time requested in this Motion.
- 4. Therefore, for all the above reasons, the Staff respectfully requests that the Commission enter an Order allowing the parties until June 26, 2001, to file their position statements, list and order of witnesses, and order of cross-examination.

Respectfully submitted,

DANA K. JOYCE General Counsel

Cliff Snodgrass Senior Counsel

Missouri Bar No. 52302

Attorney for the Staff of the Missouri Public Service Commission P. O. Box 360
Jefferson City, MO 65102
(573) 751-3966 (Telephone)
(573) 751-9285 (Fax)
snodgra@mail.state.mo.us

## **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 14th day of June, 2001.

Service List for Case No. GM-2001-342 Revised: June 14, 2001 (SW)

Office of the Public Counsel P.O. Box 7800 Jefferson City, MO 65102

Jan Bond/Sherrie A. Schroder
Diekemper, Hammond, Shinners, Turcotte
and Larrew, P.C.
7730 Carondelet Avenue, Suite 200
St. Louis, MO 63105

William J. Niehoff Mathis, Marifian, Richter and Grandy 720 West Main Street, Suite 100 Belleville, IL 62220 Lisa C. Langeneckert Attorney at Law 720 Olive Street, 24<sup>th</sup> Floor St. Louis, MO 63101

Michael C. Pendergast Laclede Gas Company 720 Olive Street, Room 1520 St. Louis, MO 63101