

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

**In the Matter of the Application of South                    )**  
**Central MCN LLC for Approval of Transfer of            )**           **File No. EA-2016-0036**  
**Assets and a Certificate of Convenience and            )**  
**Necessity    )**

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL**

COMES NOW Beverly G. Baughman, and pursuant to 4 CSR 240-2.040(6), hereby requests leave to withdraw as counsel for City Utilities of Springfield, Missouri. In support of her Motion for Leave, movant states as follows:

1. City Utilities of Springfield, Missouri will continue to be represented by John F. Black and Rex C. McCall, the remaining in-house counsel of record for City Utilities of Springfield, Missouri, and John P. Coyle of the lawfirm of Duncan & Allen.
2. As City Utilities will continue to be represented by counsel, it will not be prejudiced if the Commission grants this Motion. City Utilities has no objection to this Motion.

Respectfully submitted,

*/s/ Beverly G. Baughman*

---

John F. Black            #30352  
Rex McCall            #29751  
Beverly G. Baughman#40038  
301 E. Central  
Springfield, MO 65802  
Telephone: (417) 831-8604 (Black)  
Telephone: (417) 831-8605 (McCall)  
Telephone: (417) 831-8609 (Baughman)  
Email: [john.black@cityutilities.net](mailto:john.black@cityutilities.net)  
Email: [rex.mccall@cityutilities.net](mailto:rex.mccall@cityutilities.net)  
Email: [bev.baughman@cityutilities.net](mailto:bev.baughman@cityutilities.net)

John P. Coyle (*pro hac vice*)

Duncan & Allen  
1730 Rhode Island Avenue, N.W.  
Suite 700  
Washington, D.C. 20036-3115  
Telephone: (202) 289-8400  
Email: [jpc@duncanallen.com](mailto:jpc@duncanallen.com)

**ATTORNEYS FOR CITY UTILITIES OF  
SPRINGFIELD**

Dated: April 12, 2016.

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of City Utilities' Motion For Disposition, was sent to the following parties via ( ) U.S. Mail, postage prepaid, ( ) facsimile, ( x ) electronic transmission, and/or ( ) hand delivering this 12th day of February, 2016:

Office of the Public Counsel  
Dustin Allison  
200 Madison Street, Suite 800  
P.O. Box 2230  
Jefferson City, MO 65102  
Email: [opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov)

D. Patrick Sweeney  
Hall Ansley PC  
3275 E. Ridgeview  
Springfield, MO 65804  
Email: [psweeney@hallansley.com](mailto:psweeney@hallansley.com)

Missouri Public Service Commission  
Department Staff Counsel  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, MO 65102  
Email: [staffcounsel@psc.mo.gov](mailto:staffcounsel@psc.mo.gov)

Alison M. Nelson, Missouri Bar #58004  
Husch Blackwell LLP  
190 Carondelet Plaza, Suite 600  
St. Louis MO 63105-3433  
Email: [ali.nelson@huschblackwell.com](mailto:ali.nelson@huschblackwell.com)

Steve Dottheim  
Missouri Public Service Commission  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, MO 65102  
Email: [Steve.Dottheim@psc.mo.gov](mailto:Steve.Dottheim@psc.mo.gov)

Lowell Pearson, Missouri Bar #46217  
Husch Blackwell LLP  
235 East High Street, P.O. Box 1251  
Jefferson City, MO 65101-3206  
Email: [lowell.pearson@huschblackwell.com](mailto:lowell.pearson@huschblackwell.com)

Beth Emery  
Senior Vice President, General Counsel &  
Secretary  
South Central MCN LLC  
2 North LaSalle St.  
Chicago, IL 60602  
Email: [bemery@gridliance.com](mailto:bemery@gridliance.com)

Robert L. Daileader, Esq.  
Nixon Peabody LLP  
799 Ninth Street, N.W.  
Suite 500  
Washington, D.C. 20001-4150  
Email: [RDaileader@nixonpeabody.com](mailto:RDaileader@nixonpeabody.com)

Kyle Barry  
Husch Blackwell LLP  
190 Carondelet Plaza, Suite 600  
St. Louis, MO 63105-343  
Email: [kyle.barry@Huschblackwell.com](mailto:kyle.barry@Huschblackwell.com)

*/s/ Beverly G. Baughman*

---