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October 23, 2000

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Secretary/Chief Regulatory Law Judge

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General Counsel

FILED³

OCT 23 2000

Missouri Public
Service Commission

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

RE: Case No.GC-2001-137

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of **STAFF'S MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO ANSWER OF LACLEDE GAS COMPANY.**

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,

Bruce H. Bates
Associate General Counsel
(573) 751-7434
(573) 751-9285 (Fax)

Enclosure
cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³
OCT 23 2000

Missouri Public
Service Commission

The Staff of the Missouri Public Service Commission,
Complainant,
v.
Laclede Gas Company,
Respondent.

Case No. GC-2001-137

**STAFF'S MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO ANSWER OF
LACLEDE GAS COMPANY**

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission") and for its *Motion for Extension of Time to File Response to Answer of Laclede Gas Company* pursuant to 4 CSR 240-2.050(3)(A) respectfully states as follows:

1. Laclede Gas Company ("Laclede" or "Company") filed its *Answer of Laclede Gas Company* in this case on October 12, 2000. Any response that would be filed to this document would be due in ten days, or October 22, 2000; however, as that date fell on a Sunday, the response would be due on the following Monday, October 23, 2000, as per 4 CSR240-2.050(1).

2. Due to the tragic death of Governor Mel Carnahan and the subsequent day of mourning in honor of him, Staff was not able to work in the Governor Office Building on Friday, October 20, 2000, and has lost time to adequately respond to Laclede's filing.

3. Staff's primary reason for requesting an extension of time is to provide sufficient time for review of material presented by Laclede on October 18, 2000, to Staff and Office of Public Counsel ("OPC") during discussions following the pre-hearing for Case No. GC-2001-19, involving the

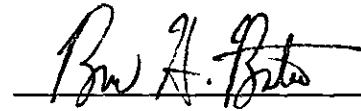
Company. This material and the related discussions between the parties are steps forward to resolve issues within that case. Coincidentally, there are similar issues in the instant case and Case No. GC-2001-19. Staff needs adequate time to examine the material presented on October 18 as it relates to the circumstances of each case. Any of this material presented by Laclede that addresses the issues within this case could advance a resolution and Staff believes should be recognized in its response to Laclede's October 12, 2000 filing in this case.

4. Staff is most anxious to have sufficient time to further examine the matters at issue in this case so that it might submit an appropriate and thorough response to the Commission. Therefore, Staff would respectfully request an extension of ten days, or until November 2, 2000, in order to file its response. This request would prejudice no party to this case. Counsel for Staff has spoken with counsel for Laclede and for OPC who have no objection to this request.

WHEREFORE, Staff prays that the Commission grant its *Motion for Extension of Time to File Response to Answer of Laclede Gas Company*, pursuant to 4 CSR 240-2.050(3)(A), for the reasons stated herein. Staff further prays that the Commission make whatever other orders and judgments appear to it to be just and proper in this cause.

Respectfully submitted,

DANA K. JOYCE
General Counsel



Bruce H. Bates
Assistant General Counsel
Missouri Bar No. 35442

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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 23rd day of October 2000.



Bruce H. Bates

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

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