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

Staff of the Missouri Public Service Commission,	)
Complainant,	) )
V.	) Case No. GC-2006-0491
Missouri Pipeline Company, LLC, Missouri Gas Company, LLC,	)
Respondents.	) )

## MOTION TO MODIFY PROCEDURAL SCHEDULE

COMES NOW the Staff of the Missouri Public Service Commission, through counsel, and for its Motion to Modify the Procedural Schedule regarding the due date for the Issues List and the Order of Cross-Examination, states as follows:

- 1. The Procedural Schedule currently in place calls for the parties to file an agreed upon Issues List and Order of Cross-Examination by November 21, 2006.
- 2. Undersigned Counsel for Staff requests that the Procedural Schedule be modified to the extent the Issues List and Order of Cross will be due on November 30, 2006.
- 3. Staff Counsel has discussed this motion with Paul DeFord, counsel for Respondents MPC and MGC and determined that the Respondents have no objection to extending the due date for the Issues List and Order of Cross until November 30, 2006.
- 4. In support of this motion, counsel states that the parties have been extensively engaged in depositions and discovery issues and have not had the chance to discuss the Issues List with all the parties. Counsel has discussed a preliminary Issues List with Mr. DeFord but as of today's date, we are not confident that the Staff and the Respondents can agree upon an Issues

List without devoting additional time to that effort. In order to further explore the possibility of an Agreed Issues List, additional time is requested.

Wherefore, the Staff by Counsel requests that the Procedural Schedule be modified so the Issues List and Order of Cross-Examination is due on November 30, 2006.

Respectfully submitted,

## /s/ Steven C. Reed

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## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or by electronic mail to all counsel of record on this 21st day of November, 2006.

/s/ Steven C. Reed