

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

R. J. Liebe Athletic Lettering Company,	)	
	)	
Complainant,	)	
	)	
v.	)	Case No. GC-2007-0192
	)	
Laclede Gas Company,	)	
	)	
Respondent.	)	

**MOTION FOR SECOND EXTENSION OF TIME TO FILE**

**STIPULATION OF FACTS NOT IN DISPUTE**

COMES NOW Staff of the Public Service Commission of Missouri (Commission), and for its Motion, states:

1. In its March 5, 2007, *Order Granting Motion For Extension of Time to File Stipulation of Facts Not in Dispute* (Order), the Commission granted the parties' request for an extension of time to file the stipulation of material facts not in dispute in this matter to not later than March 22, 2007. The Order also directed that "Should there remain any material facts in dispute, the parties shall file with the Commission, in separate individual pleadings, a list of those facts, and the parties' position on those facts."

2. At the March 15, 2007 prehearing conference, the parties discussed certain facts not in dispute, but have not as yet agreed upon a stipulation. Staff counsel has contacted counsel for Laclede, both of whom have been unable to reach counsel for Liebe, but we have no reason to believe he would oppose this request for extension. Accordingly, the parties are not able to

jointly file a stipulation of facts at this time. Therefore, the Staff and Laclede suggest that the Commission issue an order granting a second extension of time in this matter and direct that the parties file a stipulation not later than April 6, 2007.

WHEREFORE, for the above-stated reasons, the Staff respectfully requests that the Commission extend the due date for joint filing of stipulated facts not in dispute, and any separate filing by the parties of disputed facts and positions, to not later than April 6, 2007.

Respectfully submitted,

**/s/ Robert S. Berlin**

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### **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronic mail to all counsel of record this 22nd day of March 2007.

**/s/ Robert S. Berlin**