

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

Superior Bowen Asphalt Company, L.L.C.,)	
Complainant,)	
)	
v.)	File No. GC-2011-0101
)	
Southern Union Company,)	
Respondent.)	

MGE’S MOTION TO MODIFY THE PROCEDURAL SCHEDULE

COMES NOW Southern Union Company, d/b/a Missouri Gas Energy (“MGE”), by and through counsel, and for its Motion to Modify the Procedural Schedule, states as follows:

1. On July 1, 2011, the Commission issued its Notice of Hearing, Order Setting Pre-Hearing Conference, and Order Modifying Procedural Schedule. That Order set the following schedule:

<i>Event</i>	<i>Date</i>
Pre-Hearing Conference	September 16, 2011
Superior Bowen Direct	June 3, 2011
Staff/MGE Rebuttal	August 2, 2011
Superior Bowen Surrebuttal	September 9, 2011
Evidentiary Hearing	September 27 and 28, 2011

2. A key witness for MGE was informed of a death in his family today and will be unavailable for the next several days. That witness was scheduled to file his own testimony as well as review the other MGE testimony in this matter that is currently scheduled for filing on August 2nd.

3. MGE has contacted the other parties in this matter and they have agreed to certain modification to the procedural schedule, subject to the Commission’s approval. These proposed changes only address the timing of Staff/MGE Rebuttal and Superior Bowen Surrebuttal. There is no need to change either the pre-hearing conference date or the dates of

the evidentiary hearing. The parties have agreed to the following modifications to the procedural schedule, subject to Commission approval:

<i>Event</i>	<i>Date</i>
Pre-Hearing Conference	September 16, 2011
Staff/MGE Rebuttal	August 12, 2011
Superior Bowen Surrebuttal	September 16, 2011
Evidentiary Hearing	September 27 and 28, 2011

WHEREFORE, for good cause shown, MGE prays that the Commission will grant this Motion for Modification to the Procedural Schedule and set the procedural schedule as requested herein.

Respectfully,

/s/ Todd J. Jacobs

Todd J. Jacobs MBE #52366
Senior Attorney
Missouri Gas Energy, a division of Southern Union
Company
3420 Broadway
Kansas City, MO 64111
Phone: (816) 360-5976
Fax: (816) 360-5903
todd.jacobs@sug.com

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic transmission to all counsel of record on this 27th day of July, 2011.

/s/ Todd J. Jacobs

Todd J. Jacobs