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

| In the Matter of Missouri Gas Energy's           | ) |                       |
|--|---|-----------------------|
| Filing of Revised Tariffs to Increase its Annual | ) | Case No. GR-2014-0007 |
| Revenues for Natural Gas                         | j |                       |

## REQUEST FOR EXTENSION IN FILING DATES

COMES NOW Missouri Gas Energy, a division of Laclede Gas Company, and for its Request for an Extension in Filing Dates, states as follows:

- 1. On September 16, 2013, Missouri Gas Energy, a division of Laclede Gas Company ("MGE" or "Company") submitted to the Missouri Public Service Commission ("Commission") revised tariff sheets reflecting increased rates for gas service provided to customers in its Missouri service area.
- 2. By Order dated November 13, 2013, the Commission adopted the Parties' recommended procedural schedule, under which parties other than MGE were to file their direct testimony on revenue requirement on January 23, 2014.
- 3. Since the procedural schedule was adopted by the Commission, the parties have met on a number of occasions in an effort to discuss various issues raised by the Company's filing and potentially narrow their differences. While it is anticipated that the non-MGE parties will still file direct testimony, MGE believes that a modest extension in testimony filing dates would be beneficial to permit additional discussions now that Staff and the other parties are in the final stages of preparing their revenue requirement recommendations. Such discussions will assist the parties in resolving any differences that may exist as a result of factual misunderstandings, inadvertent calculation errors or other numerical differences. It may also permit the parties to make additional progress in

narrowing the substantive differences that remain in their respective positions on certain issues. All of these measures should contribute to a more straight-forward and clearer presentation of the issues, whether an overall resolution of those issues is reached or a hearing is ultimately required.

- 4. For all of these reasons, MGE respectfully requests that the filing date for direct testimony be extended for six days until January 29, 2014. If the Commission grants this extension, Staff will provide the other parties with its EMS run and workpapers on Thursday, January 23. Staff will also make its witnesses available to discuss its revenue requirements results. Therefore, it is anticipated that only a two day extension in the date for Non-MGE parties to file direct testimony on rate design and for all parties to file rebuttal will be necessary, but each Party reserves the right to request such extensions of other filing dates should a Party conclude that such action is necessary.
- 5. At the time of filing, MGE has not received a response to this proposal from counsel for City of Kansas City, AARP, or the Consumers Council of Missouri. Counsel for the remaining parties in the case have indicated that they have no objection to this request.

WHEREFORE, for the foregoing reasons, MGE respectfully requests that the Commission issue its Order herein revising the procedural schedule so that the filing deadline for "Non-Laclede/MGE parties to file Direct Testimony on revenue requirement" is extended from January 23, 2014 to January 29, 2014, the filing deadline for all non-MGE parties to file direct testimony on rate design is extended from February 5, 2014 to February 7, 2014, and the filing deadline for all parties to file rebuttal

testimony (and observe 3 and 5 business day objection/response times for data requests) is extended from February 26, 2014 to February 28, 2014.

Respectfully submitted,

MGE, A DIVISION OF LACLEDE GAS COMPANY

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## **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 22<sup>nd</sup> day of January, 2014.

Todd J. Jacobs