

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

In the Matter of the Application of Missouri Gas)
Utility, Inc., for Authority to Enter into Certain)
Debt Instruments and to Issue up to and Including)
\$26,400,000 of Long-Term Indebtedness, in One or)
More Transactions, and to, Among Other Things,)
Execute and Deliver a Mortgage and Security)
Agreement to Secure Said Indebtedness.)

Case No. GF-2010-0334

MOTION TO STAY FILING OF STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by and through the undersigned counsel, and for its motion respectfully states the following to the Missouri Public Service Commission (Commission):

1. On May 19, 2010, Missouri Gas Utility, Inc., (MGU or Company) filed an *Application* requesting Commission approval to enter into \$26,400,000 of indebtedness to be secured by a mortgage, lien and encumbrance upon its Missouri operating properties as stated within the *Application*.

2. On June 9, 2010, MGU filed a *Notice Regarding Application And Timing (Notice)* stating the amount of the financing required by the Company had changed, and that it was now going to pursue a bank loan. Within paragraph four (4) of the *Notice* the Company indicated it would file an amended application with the details of the changed circumstances. To date, the Company has not filed an amended application, or any supporting financing documents.

3. Based on MGU's June 9, 2010 filing, the Commission on June 14, 2010, directed the Staff to file a recommendation in the case by June 21, 2010. Until the Company files an amended application and the supporting financing documents, the Staff requests that the Commission stay any further recommendation in this matter.

4. Neither the Company nor the Office of the Public Counsel object to the Staff's requested relief.

WHEREFORE, the Staff submits this motion for the Commission's information and consideration and requests that the Commission stay any further recommendation in this matter by the Staff until Missouri Gas Utility, Inc., files an amended application with supporting documentation.

Respectfully submitted,

/s/Jennifer Hernandez

Jennifer Hernandez
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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing has been mailed first class postage prepaid, hand-delivered, transmitted by facsimile or electronic mail to all counsel/parties of record this 21st day of June, 2010.

/s/ Jennifer Hernandez