

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

|                                       |   |                       |
|---------------------------------------|---|-----------------------|
| ST. LOUIS NATURAL GAS PIPELINE LLC, ) | ) |                       |
|                                       | ) |                       |
| Complainant,                          | ) |                       |
|                                       | ) |                       |
| vs.                                   | ) | File No: GC-2011-0294 |
|                                       | ) |                       |
| LACLEDE GAS COMPANY,                  | ) |                       |
|                                       | ) |                       |
| Respondent.                           | ) |                       |

**ST. LOUIS NATURAL GAS PIPELINE LLC'S  
RESPONSE AND MOTION TO STRIKE THIRD-PARTY FILINGS  
OF SOUTHERN STAR AND CENTERPOINT ENERGY**

COMES NOW Complainant St. Louis Natural Gas Pipeline LLC ("SLNGP"), and moves to strike *Southern Star Central Gas Pipeline, Inc.'s Information Filing to Clarify the Record* and *Comments of Centerpoint Energy - Mississippi River Transmission, LLC* , both filed on June 6, 2011.

1. Both of these third-party submissions were improperly filed and should be stricken from the record. Neither Southern Star Central Gas Pipeline, Inc. (Southern Star) nor Centerpoint Energy - Mississippi River Transmission, LLC (MRT), are parties to the present proceeding, and they have not sought leave to intervene or to file briefs as *amicus curiae*. See 4 CSR 240-2.075. SLNGP is unaware of any Commission rule or procedure permitting non-parties to unilaterally file purported evidence in a contested complaint proceeding without leave.

2. It is unfair and prejudicial to permit Southern Star and MRT to file unchallenged pleadings or briefs as third-parties. As non-parties, SLNGP cannot serve these entities with data requests or other written discovery to examine and respond to the allegations contained in their filings. Discovery of these non-parties by subpoena and deposition would be more costly and time-consuming.

3. SLNGP should not be required to respond to fact allegations (some unsworn) by these third parties without the opportunity to conduct discovery. If and to the extent any of the allegations contained in these third-party filings have any bearing on the pending proceeding (assuming they are not stricken), SLNGP should not be required to respond until after completing discovery.

4. The similar, simultaneous filings by these third-parties, outside the Commission's rules, suggests coordination. SLNGP suspects that these filings were prompted by Laclede Gas Company. If so, they represent an improper attempt by Laclede to inject evidence in support of its arguments. Laclede cites to these filings as authority in its motion to modify discovery time limits filed June 9, 2011, to which SLNGP will respond separately. SLNGP's pending data requests to Laclede will shed light on this "joint" opposition to SLNGP's Complaint. If true, this coordinated opposition validates SLNGP's allegations regarding abuse of monopoly power and anticompetitive behavior by Laclede.

WHEREFORE, SLNGP moves the Commission to strike *Southern Star Central Gas Pipeline, Inc.'s Information Filing to Clarify the Record and Comments of Centerpoint Energy - Mississippi River Transmission, LLC* and for such other and further relief as the Commission deems just and proper.

Respectfully submitted,

**ARMSTRONG TEASDALE LLP**

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**ATTORNEYS FOR COMPLAINANT  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing was sent via e-mail and via first-class mail, postage prepaid, on this 16th day of June, 2011, to the following:

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