



**Missouri Public Service Commission**

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Chair  
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Director, Administration  
**DALE HARDY ROBERTS**  
Secretary/Chief Regulatory Law Judge  
**DANA K. JOYCE**  
General Counsel

June 7, 2001

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102

**RE: Case No. GR-2001-292**

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a **MOTION FOR PARTIAL SUSPENSION OF PROCEDURAL SCHEDULE.**

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Lera L. Shemywell  
Associate General Counsel  
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(573) 751-9285 (Fax)

LLS:sw  
Enclosure  
cc: Counsel of Record

**FILED<sup>2</sup>**

JUN 7 2001

Missouri Public  
Service Commission

FILED<sup>3</sup>

JUN 07 2001

Missouri Public Service Commission

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

In the matter of Missouri Gas Energy's )  
tariff sheets designed to increase rates )  
for gas service in the company's Missouri )  
service area. )

Case No. GR-2001-292

**MOTION OF THE STAFF, PUBLIC COUNSEL AND MISSOURI GAS ENERGY  
FOR PARTIAL SUSPENSION OF PROCEDURAL SCHEDULE**

Come now the Staff of the Missouri Public Service Commission ("Staff"), the Office of the Public Counsel ("Public Counsel") and Missouri Gas Energy ("MGE"), a division of Southern Union Company, by and through counsel, and for this motion for partial suspension of procedural schedule respectfully state the following:

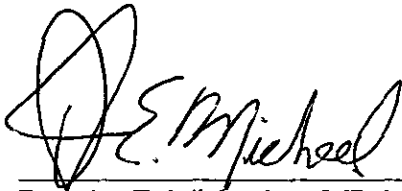
1. Since the conclusion of the prehearing conference, the Staff, Public Counsel and MGE have been able to reach agreement in principle which they believe will resolve almost all of the issues in this proceeding. The Staff, Public Counsel and MGE are working to file a Stipulation and Agreement with the Commission as soon as possible, possibly by the close of business on June 8, 2001, and in any event no later than June 12, 2001.

2. The Staff, Public Counsel and MGE respectfully suggest that limited resources are better devoted to finalizing a Stipulation and Agreement than preparing surrebuttal testimony on what are believed to be settled issues. Therefore, the Staff, Public Counsel and MGE suggest that it would be reasonable to suspend the procedural schedule (e.g., the filing of surrebuttal testimony, the preparation of position statements and the scheduling of hearing time) as to those issues which are believed to be settled. At this point in time, the only issues which the Staff, Public Counsel and MGE believe

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remain in dispute are 1) class cost-of-service/class revenue responsibility and 2) the low-income fixed credit tariff rate proposed by Public Counsel.

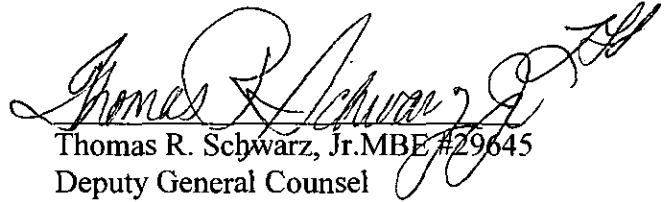
**Wherefore**, the Staff, Public Counsel and MGE respectfully requests that the Commission suspend the procedural schedule concerning all issues except those as set forth in paragraph 2, above. If agreement is not reached as planned the Staff, OPC and MGE will inform the Commission immediately and propose a new schedule for the filing of surrebuttal testimony so that the hearing may proceed as scheduled.



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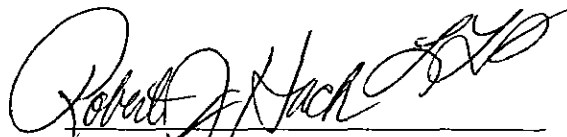
ATTORNEY FOR THE OFFICE  
OF THE PUBLIC COUNSEL

Respectfully Submitted,



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PUBLIC SERVICE COMMISSION

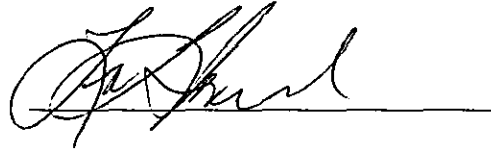


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ATTORNEY FOR MISSOURI  
GAS ENERGY

**Certificate of Service**

I hereby certify that a copy of the foregoing document was mailed or hand delivered this 7th day of June, 2001, to all counsel of record.

A handwritten signature in cursive script, appearing to read "J. Shul", is written over a horizontal line.

**Service List for  
Case No. GR-2001-292  
Revised: June 7, 2001 (SW)**

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