

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

In the matter of Proposed Emergency)	
Amendment to Commission Rule 4 CSR)	Case No. GX-2006-0181
240-13.055)	

**PUBLIC COUNSEL’S RESPONSE TO COMMISSION REQUEST FOR
ADDITIONAL INFORMATION**

COMES NOW the Office of the Public Counsel and in the above-captioned case states as follows:

On December 16, 2005, Public Counsel filed a Response to the Commission's Order Directing Filing dated December 13, 2005. In that filing, Public Counsel commented on three recommendations made by Jacqueline A. Hutchinson in comments filed in this docket on December 12, 2005.

Attachment 1 to Public Counsel's December 16 filing illustrated the possible impact on customer bills associated with requiring only a \$60 per month payment from low-income customers during winter months and deferring payments over a 24 month period.

In response to Commission inquiries, Public Counsel has prepared Attachment 1 to this filing which illustrates possible impacts on customer bills associated with alternative assumptions regarding: 1) the percentage of current charges that a customer must pay during November–March to retain service (50%, 66.67%, 75% or 80%) coupled with deferring payments over a 24 month period and 2) the gas costs for April – October (\$4.50, \$6.00, \$7.50 or \$9.00).

Attachment 2 is an Excel Worksheet that permits anyone to change the numbers using different scenarios for gas price, percentage minimum payment, and number of years of deferral.

Respectfully submitted,

Office of the Public Counsel

/s/ Eric A. Martin

By: _____
Eric A. Martin (#48783)
Senior Public Counsel
P.O. Box 2230
Jefferson City, MO 65109
(573) 751-5558
(573) 751-5562 FAX
eric.martin@ded.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the following this 22nd day of December, 2005.

Dana K. Joyce
Missouri Public Service Commission
P.O. Box 360
200 Madison Street, Suite 800
Jefferson City, MO 65102
GenCounsel@psc.mo.gov

Thomas M. Byrne
Ameren UE
1901 Chouteau Avenue
P.O. Box 66149
St. Louis, MO 63166-6149
tbyrne@ameren.com

Michael C. Pendergast
Laclede Gas Company
720 Olive Street, Suite 1520
St. Louis, MO 63101
mpendergast@lacledegas.com

Dean L. Cooper
Brydon, Swearngen & England, P.C.
312 E. Capitol, P.O. Box 456
Jefferson City, MO 65102
dcooper@brydonlaw.com

Robert Hack
Missouri Gas Energy
3420 Broadway
Kansas City, MO 64111
rhack@mgemail.com

James M. Fischer
Fischer & Dority, P.C.
101 Madison Street, Suite 400
Jefferson City, MO 65101
jfischerpc@aol.com

Doug Micheel
Attorney General's Office
Consumer Fraud Division
P.O. Box 889
Jefferson City, MO 65102
douglas.micheel@ag.mo.gov

/s/ **Eric A. Martin**
