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LACLEDE GAS COMPANY
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MICHAEL C. PENDERGAST
VICE PRESIDENT
ASSOCIATE GENERAL COUNSEL

October 18, 2010

Mr. William J. Niehoff
Mathis, Marifian, Richter & Grandy, Ltd.
23 Public Square, Suite 300
P.O. Box 307
Belleville, IL 62222-0307

Re: Case Nos. GR-2006-0288 and GR-2005-0203

Dear Bill:

As attorney for Laclede Gas Company ("Laclede" or "Company"), I am writing to you, as attorney for Laclede Energy Resources, Inc. ("LER"), regarding information requests served by the Missouri Public Service Commission Staff upon Laclede seeking a host of LER business information. According to a document submitted by the Staff to the Commission on September 30, 2010, the enclosed Attachment A represents the information requested and the response. As you know, Laclede has been receiving a great deal of pressure from the Staff to produce LER's business records.¹

We have discussed these information requests on numerous occasions, and I understand that LER's position is, among other things, that the information requested is not germane to evaluating actual affiliate transactions between LER and Laclede, but is instead an unwarranted, disruptive and unnecessary interruption of LER's legitimate business activities. Laclede agrees with LER's position, and Laclede has actually taken the unusual step of filing a counterclaim against the Staff for its failure to review affiliate transactions in accordance with the Commission's Affiliate Transaction Rules and the Company's Cost Allocation Manual.

LER has always been very cooperative in providing the information necessary to determine a fair market price for affiliate transactions, so that Laclede could demonstrate compliance with the Commission's Affiliate Transaction Rules and the Company's Cost Allocation Manual. In addition, LER has willingly provided additional information not necessary to determining fair market price, such as information relating to LER's purchases of gas supply on the MRT West Line. I am writing to formally request that LER consider anew the Staff's request to produce the documents listed in Exhibit A. If LER declines to produce any of the requested documents, please respond promptly with the reasons for its objection.

¹ Although Staff claims to need these LER non-affiliate related business documents, Staff refuses to address its request directly to LER by means of a subpoena.

Exhibit No. 4
Date 11-4-10 Reporter TW
File No. GR-2005-0203
GR-2006-0288

I look forward to hearing from you.

Sincerely,

/s/ Michael C. Pendergast
Michael C. Pendergast