

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

In the Matter of the Adequacy of Laclede     )  
Gas Company's Service Line Replacement     )  
Program and Leak Survey Procedures.         )

Case No. GO-99-155

**MEMORANDUM TO THE COMMISSION**  
**CONCERNING EXPECTED FILING OF STAFF'S STATUS REPORT**

COMES NOW the Staff of the Missouri Public Service Commission and in response to the Commission's April 6, 2004 Order Directing Filing states:

1. On April 6, 2004, the Commission ordered Staff to file a Status Report stating when Staff anticipates filing its next Annual Report in this case.
2. Attached is Staff's Status Report in response to the Commission's Order Directing Filing.
3. If, before Staff's anticipated filing of its Annual Report, there is any issue regarding Laclede's copper service line replacement and leak survey program that needs to be brought to the attention of the Commission, Staff will make a filing immediately.

WHEREFORE Staff requests the Commission accept Staff's Status Report in satisfaction of its April 6, 2004 Order Directing Filing.

Respectfully submitted,

DANA K. JOYCE  
General Counsel

/s/ Lera L. Shemwell  
Lera L. Shemwell  
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#### **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 19th day of April, 2004.

/s/ Lera L. Shemwell

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Case No. GO-99-155

**STAFF'S STATUS REPORT**

COMES NOW the Staff of the Missouri Public Service Commission and, in response to the Commission's April 6, 2004 Order Directing Filing, states:

1. On October 14, 1998, Staff filed a motion to open a case to investigate the adequacy of Laclede Gas Company's (Laclede or Company) current direct-buried-copper-service-line replacement program and the effectiveness of the Company's leak survey procedures and investigations.

2. On October 30, 1998, the Commission issued an ORDER ESTABLISHING CASE for the purpose of receiving information relevant to the adequacy of Laclede's copper-service-line replacement program and the effectiveness of the Company's leak surveys and investigations.

3. On February 18, 2000, the Parties filed a UNANIMOUS STIPULATION AND AGREEMENT. Among other requirements, Agreement 7(h) states that: "after the third year of this program, Laclede and the Gas Safety Staff will review the progress and results of the Company's Copper Service Safety Program to determine future relay/renewal plans, including the rate of such future actions, potential modifications to survey techniques and other related matters." In addition, Agreement 7(k) states that "Laclede agrees to submit status reports to the Staff detailing the direct-buried copper service line renewals and relays completed...such annual reports shall be submitted no later than April 30 of each program year."

4. On October 28, 2002, the Staff filed an Update Report to Laclede's Copper Service Line Program Pertaining to Case No. GO-99-155, that summarized data obtained during Staff's ongoing monitoring of the program's progress. This interim update report, with information available through October 2002, indicated Laclede was in compliance with the requirements of the Unanimous Stipulation and Agreement, and Staff expected Laclede to meet their 2002-2003 (through March 1, 2003) goal of 8,000 renewals. Staff continues to monitor the adequacy of Laclede's direct-buried-copper-service-line replacement program and the effectiveness of the leak surveys and investigations, and believe the program is progressing as designed.

5. On August 1, 2003 Staff filed STAFF'S THREE YEAR SUMMARY REPORT CONCERNING LACLEDE'S COPPER SERVICE LINE REPLACEMENT PROGRAM detailing the copper-service line relays/renewals and annual bar-hole leak surveys for each of the first three program years. Staff requested that the Commission approve its recommendation to continue the current requirements of the Stipulation and Agreement, with continued annual reporting from the Staff to the Commission pertaining to the matters addressed in the Stipulation.

6. On March 5, 2004, the Commission issued its REPORT AND ORDER approving Staff's recommendation that the Commission continue the current requirements of the previously approved UNANIMOUS STIPULATION AND AGREEMENT, with annual reporting from Staff to the Commission.

7. Laclede's 2004 annual bar-hole leak survey will begin in early spring and is required to be completed by July 1<sup>st</sup>. Staff believes that information from the results of that leak survey are pertinent to, and a necessary part of, Staff's review of the program and that information from these surveys will enable the Staff to provide a more complete report to the Commission.

8. Staff, therefore, requests sufficient time, of up to September 1, 2004, to complete its analysis of service-line replacement information and leak survey data to provide the Commission with a comprehensive update report detailing the results of the copper-service-line relays/renewals and bar-hole leak survey completed since Staff filed its three-year summary report on August 1, 2003.

9. Staff sponsors the September 1st deadline to allow time for thorough review of Laclede's April 30 annual program status report and to permit the 2004 bar-hole survey results to be incorporated within Staff's report to the Commission.

10. If, at any time during its monitoring and review of this program, Staff believes that changes to the program are necessary, Staff will file a notice with the Commission to recommend that the Commission order corrective action to address Staff's concerns.

WHEREFORE, the Staff respectfully requests that the Commission approve the September 1, 2004 deadline for its report to the Commission so that Staff's report can include up-to-date and pertinent information.

Respectfully submitted,

DANA K. JOYCE  
General Counsel

/s/ Lera L. Shemwell

Lera L. Shemwell  
Senior Counsel  
Missouri Bar No. 43792

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