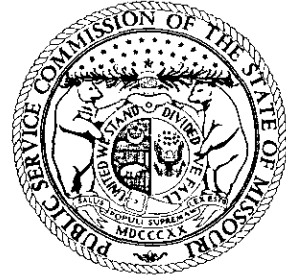


Notice of *Ex Parte* Contact

TO: Data Center
All Parties in Case No. **GR-2007-0208**

FROM: Chairman Jeff Davis
Commissioner Connie Murray
Commissioner Steve Gaw
Commissioner Robert Clayton
Commissioner Lin Appling



DATE: February 8, 2007

On February 5, 2007 we received the attached anonymous letter regarding Laclede. The Commission is currently considering issues which may be related to case **GR-2007-0208** which is a contested case. In contested cases, the Commission is bound by the same *ex parte* rule as a court of law.

Although communications from members of the public and members of the legislature are always welcome, those communications must be made known to all parties to a contested case so that those parties have the opportunity to respond. According to the Commission's rules (4 CSR 240-4.020(8)), when a communication (either oral or written) occurs outside the hearing process, any member of the Commission or Regulatory Law Judge who received the communication shall prepare a written report concerning the communication and submit it to each member of the Commission and the parties to the case. The report shall identify the person(s) who participated in the *ex parte* communication, the circumstances which resulted in the communication, the substance of the communication, and the relationship of the communication to a particular matter at issue before the Commission.

Therefore, we submit this report pursuant to the rules cited above. This will ensure that any party to this case will have notice of the attached information and a full and fair opportunity to respond to the comments contained therein.

cc: Commissioners
Executive Director
Secretary/Chief Regulatory Law Judge
General Counsel

To Whom It May Concern:

As well stated in a letter from Mr. Yaeger sent to all employees December 2003 "The most effective way to maintain an ethical, honest company is also the most simple, doing what's right every day by avoiding inappropriate behavior."

Please find enclosed two documents that have the name of Central District Service and Installation General Foreman Joseph J. Williams. The page from Goodman Manufacturing has his private business listed as one of their dealers. The bid page was sent from a Laclede Gas Company fax machine along with a Laclede Gas Company contact phone number, soliciting work for his private business. Mr. Williams has denied under oath that these documents implement him with this current business. Mr. Joseph Williams has personally installed a furnace for a Mr. Enrique White. In a rental home that Mr. White owns in North County. Mr. White also claims that he obtained Mr. Joseph William's contact number from a Laclede Gas Service Technician.

Mr. Gerry Goerla, Director of Industrial Relations has direct knowledge of other reports of unethical activity about Mr. Joseph Williams. These reports were taken via "Do the Right Thing". The 800 number Laclede Gas Company set up for individuals to use and report unethical or illegal activity. Those reports taken by the 800 number alleged Mr. Williams using illegal drugs.

This information was sent earlier this year to all Laclede Group Board Members. These facts should concern both company and public sectors of this community. More undeniable evidence will be available in the near future of Mr. Joseph William's unethical activities.

The theory behind Laclede Gas Company not performing furnace installations is Laclede has nothing to gain by condemning your furnace. Laclede has adopted a new unwritten policy of looking the other way in this particular case. Mr. Joseph Williams has access to all addresses in which Laclede condemns customer's furnaces that must be replaced.

Each Director and employee has a duty to adhere to this policy and to report to the Company a suspected violation; these suspected violations have been reported prior to Service and Installation Supervisors, unfortunately its business as usual for Mr. Joseph Williams.

This all has the appearance of violating the Laclede Group, Inc. Conflict of Interest Policy Sections "A", "B", "C".

Enclosed are company policies that pertain to the violations of said letter.

Thank you for your interest.

Cc: Attorney General Jay Nixon
Congressman Wm. Lacy Clay
Senator Claire McCaskill
PSC Commissioners
Jeff Davis
Connie Murray
Seve Gaw
Robert M. Clayton III
Linward Appling

Leisa Zigman
Elliot Davis
Peter Palumbo
Douglass H. Yaeger

TX FUNCTION WAS NOT COMPLETED

TX/RX NO	3381	
CONNECTION TEL		96362254767
SUBADDRESS		
CONNECTION ID		
ST. TIME	03/21 07:22	
USAGE T	00'00	
PGS. SENT	0	
RESULT	NG	#018 BUSY/NO SIGNAL

Bid for Heating & Cooling

Date: March 17, 2005

To: Gary
4439 Athlone 1ST AND 2ND FLOOR

From: Joseph J. Williams
P.O.Box 2542
Florissant Mo. 63032

Install two ninty plus furnace and all ductwork for 1st and 2nd floor, install all gas piping for furnaces.

2 - GMS90703BXA
GAS PIPING
PVC PIPE
WIRING
THERMOSTATS
DUCTWORK AND BOOTS

TOTAL COST \$7,500.00

JOSEPH WILLIAMS

314-565-5966

Goodman

Air Conditioning & Heating

[Home](#)[About
Goodman](#)[Product
Information](#)[Heating &
Cooling 101](#)[Locate a
Dealer](#)[Warranty](#)

Home > Locate a Dealer

[Locate a Dealer ▼](#)

Dealer Locator Search Results

Dealers within 10 miles radius from zipcode 63033

Address/Contact Info	Distance
1. AIR AUTHORITY INC. 12045 MIGNON FLORISSANT, MO 63033 Phone: 314-355-6217 Fax: Email: Contact: CHARLES CUMMINGS Web site:	0 mile
2. J AND J HEATING ST LOUIS 1933 SPRING BEAUTY DR FLORISSANT, MO 63033 Phone: 314-750-4594 Fax: Email: Contact: JOSEPH J. WILLIAMS Web site:	0 mile
3. J PATRICO HEATING & COOLING 13460 OLD JAMESTOWN ROAD FLORISSANT, MO 63033 Phone: 314-355-2396 Fax: Email: Contact: JOHN PATRICO Web site:	0 mile
4. THOMPSONS HTG & AIR 6196 LAKE PADDOCK FLORISSANT, MO 63033 Phone: 314-768-2389 Fax: Email: Contact: MORRIS Web site:	0 mile
5. ABBEY HEATING/COOLING 200 HUMES LANE FLORISSANT, MO 63031 Phone: 314-837-5525 Fax: Email: Contact: Web site:	3 mile
6. DON ZACH	3 mile

THE LACLEDE GROUP, INC.
CONFLICT OF INTEREST POLICY
(As Amended July 24, 2003)

A conflict of interest may arise in any situation in which a director's or an employee's loyalties are divided between business and personal interests that, to some degree, are incompatible or competitive with the interests of The Laclede Group and its subsidiaries and affiliates. References in this Policy to the Company include its subsidiaries and affiliates as well. Such conflicts should be avoided. No director or employee should knowingly place himself or herself in a position that would have the appearance of being, or could be construed to be, in conflict with interests of the Company. Some of the more sensitive areas of conflicts of interest and the Company's related guidelines are as follows.

A. Accepting Gifts and Entertainment

To avoid the reality and the appearance of improper relations, you should not seek or accept, directly or indirectly, personal gifts, entertainment opportunities or other types of personal gain from anyone soliciting or doing business with the Company or from any person or firm in business competition with the Company. The only exception would be items of moderate value, and then only if acceptance of the item will not adversely affect your objectivity to perform in the Company's best interest. It is never allowable to accept cash or a cash equivalent from a vendor, supplier or customer. Cash equivalents include checks, money orders and vouchers.

B. Corporate Opportunities/Outside Activities

You shall not use Company information and resources for direct or indirect personal gain, whether the benefit is financial or otherwise. You should not use your contacts or position with the Company to advance your own private business or financial interests, whether or not at Company expense.

C. Company Property and Facilities

Company assets are to be used for legitimate business purposes, and you should protect Company assets and ensure their efficient use.

You shall not use Company property, facilities or physical resources for solicitation or distribution activities that are not related to your services to the Company.

Anyone engaging in or attempting theft or vandalism of any property of the Company or any employee, including documents, equipment, personal property, cash or any other items of value will be liable to immediate discipline, including dismissal and possible criminal proceedings. Your duty is to protect the Company's property, facilities

and physical resources and to report any theft, vandalism, or attempted theft or vandalism to management.

D. Company Proprietary and Other Confidential Information

You shall not use the Company's confidential information or intellectual property for your direct or indirect personal benefit, and you are obligated and owe a duty to protect and safeguard confidential information and intellectual property of the Company. All of the Company's proprietary data and technology shall be kept confidential, both during and after the term of employment. All files, records and reports acquired or created in the course of employment or the provision of services are the property of the Company. You may only remove originals or copies of such documents from the Company's offices for the sole purpose of performing your duties to the Company and you must return the documents at any time upon request.

In the interests of both customers and shareholders, the Company seeks to safeguard the confidentiality of commercially sensitive information, trade secrets and other proprietary data in the Company's possession. To ensure this protection, this information and data should never be given to outsiders, unless (a) there is an important legal or business reason to do so; (b) written restrictions prohibiting the disclosure of such information or data by the receiving party have been obtained; and (c) the disclosure has been approved in writing by the Company.

You must respect the confidentiality of our customers' and suppliers' information. You should not use proprietary or confidential information from or about another company inappropriately nor provide this information to others. To help ensure protection of such information, you should not accept proprietary or confidential information on behalf of the Company without appropriate authorization by the Company's Legal Department, unless there is a nondisclosure agreement covering the use and handling of such information. If the information is subject to a nondisclosure or confidentiality agreement, you must also comply with the terms of the agreement in the use and handling of the information.

If you are unsure as to the confidentiality or proprietary nature of information, you should contact the Legal Department.

The trust that our customers place in us is a highly valuable asset. It is a serious violation of our standards, and in some cases a violation of law, to use customer information for anything other than Company business purposes. Even requests from law enforcement or governmental agencies should be referred to the Legal Department.

E. Trademarks, Servicemarks and Copyrights

Trademarks and servicemarks – words, slogans, symbols, logos or other devices used to identify a particular source of goods or services – are important business tools

and valuable assets that require care in their use and treatment. You must not negotiate or enter into any agreement respecting the Company's trademarks, servicemarks or logos without first consulting the Legal Department. The Company also respects the trademark rights of others, and any proposed name of a new product, financial instrument or service intended to be sold or rendered to customers must be submitted to the Legal Department for clearance prior to its adoption and use. Similarly, using the trademark or servicemark of another company, even one with which our Company has a business relationship, always requires clearance or approval by our Legal Department to ensure that the use of that other company's mark is proper.

Caution must be exercised in using computer software. Much of the software used at the Company was created and copyrighted by other companies and may be subject to license and/or nondisclosure restrictions. Reproducing or otherwise copying or using software without authorization may violate these agreements and the U. S. Copyright laws. Accordingly, you shall not copy, download, resell or transfer the software created by another company, unless the Legal Department determines that such action is authorized under an applicable software license agreement.

The Company is legally entitled to all rights in ideas, inventions and works of authorship relating to its business that are made by you within the scope of your employment with the Company or using the resources of the Company.

INTERPRETATION AND IMPLEMENTATION

If you have questions about this Policy or are in doubt as to the best course of action in a particular situation, you should talk to your supervisor, manager, the head of Internal Audit, or the Corporate Secretary. Directors may also contact a member of the Corporate Governance Committee.

Each director and employee has a duty to adhere to this Policy and to report to the Company any suspected violations. Violations must be reported to the head of Internal Audit or the Corporate Secretary. Effective January 1, 2004, you may also report violations anonymously through the Compliance Hotline. The Company will investigate any matter so reported and may take appropriate disciplinary and corrective action, up to and including termination. The Company prohibits retaliation against employees who report violations of this Policy in good faith.

Laclede Building
720 Olive St.
St., Louis MO 63101

SAINT LOUIS MO 631

31 JAN 57 PM 03 1



Jeff Davis, Chairman
PSC
Governor Office Building
200 Madison St.
P.O. Box 360
Jefferson City, MO 65102-0360

65102+0360

