

LACLEDE GAS COMPANY  
720 OLIVE STREET  
ST. LOUIS, MISSOURI 63101  
(314) 342-0533

RICK ZUCKER  
ASSISTANT GENERAL COUNSEL-REGULATORY

FILED<sup>4</sup>

DEC 29 2003

December 24, 2003

Missouri Public  
Service Commission

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
200 Madison Street  
P. O. Box 360  
Jefferson City, MO 65101


RE: Case No. GO-2003-0506

Dear Mr. Roberts:

Please find enclosed for filing on behalf of Laclede Gas Company ("Laclede") in the above captioned case an original public version of a Motion to File Post-Hearing Exhibit plus eight copies of a proprietary version to be filed under seal.

Thank you for your assistance in this matter.

Very truly yours,

  
Rick Zucker (RZ)

RZ:kz

cc: All Parties of Record

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>4</sup>

DEC 29 2003

Missouri Public  
Service Commission

In the matter of the verified application of Laclede Gas )  
Company for an Order establishing replacement )  
requirements for the final phase of its unprotected steel ) Case No. GO-2003-0506  
main replacement program previously approved pursuant )  
to Rule 4 CSR 240-40.030(15)(E) )

**LACLEDE GAS COMPANY'S**  
**MOTION TO FILE POST-HEARING EXHIBIT**

**COMES NOW** Laclede Gas Company ("Laclede" or "Company"), pursuant to 4 CSR 240-2.130(17), and in support of its Motion to File Post-Hearing Exhibit, states as follows.

1. Pursuant to an Order Scheduling Evidentiary Hearing and Notice of Invitation issued in this case on November 20, 2003, the Commission held an expedited hearing on December 5, 2003. The limited purpose of the hearing was to provide the Commissioners with an opportunity to ask questions regarding Laclede's pending application to establish a 10,000 foot per year replacement schedule for its unprotected steel main program and Staff's recommendations regarding continuation of the Company's copper service line replacement program.

2. During the December 5 hearing, in response to questions from the Commission, Laclede witness Craig Hoferlin provided testimony on Laclede's estimated expenditures between 1998 and 2004 on its major safety replacement programs. (Tr. 173-74, 177-83). Upon review of that testimony, Laclede can confirm all of the figures provided by Mr. Hoferlin, except for the annual expenditures on the unprotected steel main program. In its haste to provide a quick breakdown of the costs for each of these


major safety programs, Laclede inadvertently used an incorrect average cost per foot to calculate what portion of these overall expenditures were associated with its unprotected steel main program. The attached exhibit corrects for this inaccuracy and shows the proper level of annual expenditures related to the Company's unprotected steel main replacement program.

3. Laclede would further note that the figures it provided on unprotected steel replacement expenditures on December 5, and that it provides in corrected form in the attached Exhibit, cover only expenditures associated with categories 3 through 6 in Commission Rule 40.030(15)(E). These figures do not include costs incurred to replace unprotected steel main in categories 1 and 2 of Rule 40.030(15)(E), since Laclede has completed replacements in that category. However, Laclede would note that such expenditures averaged approximately \$150,000 each year.

4. Laclede seeks to file the attached post-hearing exhibit in order to provide the Commission with a more accurate calculation of the amounts expended by Laclede on its unprotected steel main program. Because replacement of unprotected steel main is the specific subject matter of this case, it is important that this information be as accurate as possible.

WHEREFORE, for the foregoing reasons, Laclede Gas Company respectfully requests that the Commission accept the post-hearing exhibit attached hereto and designated as Exhibit 3/Exhibit 3P in this case.

Respectfully submitted,



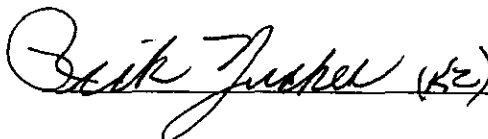
Michael C. Pendergast MB #31763 (KZ)  
Vice President - Associate General Counsel  
(314) 342-0532 Phone  
mpendergast@lacledegas.com

Rick Zucker  
Assistant General Counsel  
(314) 342-0533 Phone  
rzucker@lacledegas.com

Laclede Gas Company  
720 Olive Street, Room 1520  
St. Louis, MO 63101  
(314) 421-1979 Fax

**Certificate of Service**

The undersigned certifies that a true and correct copy of the foregoing Response of Laclede Gas Company was served on the General Counsel of the Staff of the Missouri Public Service Commission and the Office of the Public Counsel on this 22nd day of December, 2003 by regular mail, hand-delivery, fax, or electronic mail.



**NP**

**EXHIBIT 3**

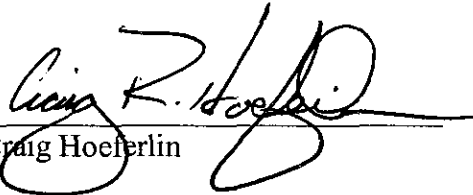
**UNPROTECTED STEEL MAIN REPLACEMENT PROGRAM  
EXPENDITURES FOR RULE 40.030(15)(E)(3-6)  
1998 - 2004**

<b>YEAR</b>	<b>Actual And Estimated Expenditures On Unprotected Steel Main Replacement Program Under Rule 40.030(15)(E)(3-6) 1998-2004 (In \$000)</b>
<b>1998</b>	<b>936</b>
<b>1999</b>	<b>697</b>
<b>2000</b>	<b>1,656</b>
<b>2001</b>	<b>919</b>
<b>2002</b>	<b>785</b>
<b>2003</b>	<b>736</b>
<b>2004</b>	<b>**    **</b>

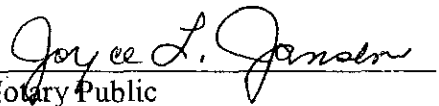
**AFFIDAVIT**

STATE OF MISSOURI     )  
                                      ) ss  
CITY OF ST. LOUIS     )

I, Craig Hoeflerlin, having been duly sworn upon my oath, state that I am Vice President of Operations for Laclede Gas Company, and that the matters set forth in the foregoing Motion to File Post-Hearing Exhibit, including the attached Exhibit 3, are true and correct to the best of my information, knowledge and belief.

  
Craig Hoeflerlin

Subscribed and sworn before me this 10th day of December 2003.

  
Notary Public

JOYCE L. JANSEN  
Notary Public — Notary Seal  
STATE OF MISSOURI  
ST. CHARLES COUNTY  
My Commission Expires: July 2, 2005



DEC 24 2003

Commissioners

STEVE GAW  
Chair

CONNIE MURRAY

KELVIN L. SIMMONS

BRYAN FORBIS

ROBERT M. CLAYTON III

Missouri Public Service Commission

POST OFFICE BOX 360  
JEFFERSON CITY, MISSOURI 65102  
573-751-3234  
573-751-1847 (Fax Number)  
<http://www.psc.mo.gov>

ROBERT J. QUINN, JR.  
Executive Director

WESS A. HENDERSON  
Director, Utility Operations

ROBERT SCHALLENBERG  
Director, Utility Services

DONNA M. PRENGER  
Director, Administration

DALE HARDY ROBERTS  
Secretary/Chief Regulatory Law Judge

DANA K. JOYCE  
General Counsel

December 23, 2003

Rick Zucker  
Laclede Gas Company  
720 Olive Street  
St. Louis, MO 63101

*See attached*

Re: GO-2003-0506

Dear Mr. Zucker:

The Commission is returning the enclosed documents for the following reason(s).

- ☐ All pleadings must make reference to the statutory provision or other authority under which relief is requested. (*Reference: 4 CSR 240-2.080 (3) – Pleadings, Filing and Service*)
- ☐ All pleadings, unless filed pro se, must be filed by an attorney licensed to practice law in the State of Missouri. (*Reference: 4 CSR 240-2.040 (5) – Practice Before the Commission (Supreme Court Rule 55.03)*)
- ☐ An attorney who is not licensed to practice in Missouri must retain local counsel and follow the provisions of 4 CSR 240-2.040 – Practice Before the Commission.
- ☐ All attorney signatures must be followed by the attorney's Missouri Bar number or similar designation from another state. (*Reference: 4 CSR 240-2.080 – Practice Before the Commission (Supreme Court Rule 55.03)*)
- ☐ All applications for Certificates of Service Authority to provide Interexchange, Local Exchange or Basic Local Exchange service must contain a tariff bearing a 45-day effective date. (*Reference: 4 CSR 240-3.510*)
- ☐ An application of the type enclosed must include a Certificate of Good Standing and/or a registration of Fictitious Name from the Missouri Secretary of State's Office. (*Reference: 4 CSR 240-2.060 (1)(B) and (E) – Applications*)
- ☐ For an association, a list of its members must be included. (*Reference: 4 CSR 240-2.060 (1)(J) – Applications*)

December 23, 2003

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- ☐ Territorial agreements must include an illustrative tariff as an exhibit. (*Reference: 4 CSR 240-3.130(B) – Electric*)
- ☐ 30 days' notice to the commission is required as to every publication relating to telephone rates or service. (*Reference: 4 CSR 240-3.545*)
- ☒ Other: The enclosed pleading must be signed by at least one attorney of record. (*Reference: 4 CSR 240-2.080(1)-Pleadings, Filing, and Service*)

Requested or corrected information should be returned to:

Missouri Public Service Commission  
Secretary of the Commission c/o Data Center  
P.O. Box 360  
Jefferson City, MO 65102-0360.

Upon the discovery of a cause for rejection, our work on your documents was discontinued so that we could return these documents without delay. The list of deficiencies herein does not foreclose the possibility of other deficiencies. It is the sole responsibility of the filing party to ensure that documents submitted to the Commission meet the filing requirements of 4 CSR 240-2 and 4 CSR 240-3. These rules are readily available at <http://www.psc.state.mo.us/rules.asp>.

It is important to note that the Data Center performs the same function as the Circuit Clerk's office of the court. The Data Center has the authority to determine if a pleading appears to have satisfied the filing requirements of the Commission. Data Center employees cannot advise an applicant on matters concerning the practice of law.

Please contact the Deputy Secretary of the Commission, Kim Happy, at 573-751-7496 if you have questions regarding your returned documents.

Sincerely,

  
Dale Hardy Roberts, Chief Judge  
Secretary of the Commission

Enclosure(s)