

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the matter of the verified application)
of Laclede Gas Company for an order)
establishing replacement)
requirements for the final phase of its)
soft copper service line replacement)
program previously approved pursuant)
to Case No. GO 99-155 and as)
revised by Case No. GS-2008-0038.)

Case No. GS-2008-0038

STAFF REQUEST FOR ADDITIONAL TIME TO FILE ANNUAL REPORT

COMES NOW the Staff of the Missouri Public Service Commission and, for its Request for Additional Time to File Its Annual Report in this matter 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) 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 (Case No. GO-99-155) 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 (Agreement), in which Section 7(h) states: "[a]fter 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."

4. On August 8, 2007 Laclede filed, in this case, a Verified Application Requesting a Revision in the Replacement Requirements for Case No. GO-99-155 Establishing the Adequacy of the Company's Copper Service Line Replacement Program and Leak Survey Procedures for Soft Copper Service Lines.

5. On September 6, 2007, Staff responded with its recommendation that Laclede's copper service line replacement program and its leak survey procedures had met the program goals of reducing the number of gas leaks found on copper service lines.

6. Staff further recommended, and Laclede agreed, to a slight reduction in the number of soft copper service lines Laclede was required to replace annually from 8,000 to 7,000. The average overall number of service line replacements will, however, remain at approximately 8,000 annually for the term of the program.

7. On September 20, 2007, the Commission issued its *Order Granting Reduction of Replacement Requirements*.

8. Staff's Annual Report on Laclede's progress with soft copper service line replacements and its gas leak survey procedures is due on September 1.

9. Staff received information from Laclede on its progress in complying with the *Order Granting Reduction of Replacement Requirements* on Friday August 28 and is still in the process of reviewing the information in preparation for filing Staff's Annual Report.

10. In order to have adequate time to review the information and prepare its report, Staff proposes to file its Report no later than September 18.

11. Staff has contacted both Laclede and the Office of the Public Counsel and both agree with Staff's request.

12. Staff will continue to report to the Commission annually and, if at any time the leakage rate increases or Staff determines that public safety is compromised, Staff shall immediately present this information to the Commission and recommend appropriate remedial action.

WHEREFORE, the Staff respectfully requests that the Commission accept Staff's proposal to file its Annual Report no later than September 18.

Respectfully submitted,

/s/ Lera L. Shemwell

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 1st day of September, 2009.

/s/ Lera L. Shemwell