

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) **Case No. GO-2003-0506**
Requirements For The Final Phase Of Its Unprotected)
Steel Main Replacement Program Previously Approved)
Pursuant To Rule 4 CSR 240-40.30 (15) (E))

Concurring Opinion of Commissioner Clayton


Although this Commissioner concurs with the majority's Order Regarding Status Report and Directing Filing, this Commissioner remains concerned about the safety of all unprotected steel mains, copper service lines, cast iron mains and their replacement. The majority's order allows Laclede to continue its replacement program and file annual reports with the Commission. Laclede's current replacement program requires the replacement of an average of 10,000 feet per year - a reduction from the original program that required the replacement of an average of 20,000 feet per year. Since the reduced requirement went into effect, Laclede has replaced an average of 10,400 feet of unprotected steel main each year. Laclede reports that it has 92,192 feet of unprotected steel main left at the end of Fiscal Year 2005.

While this Commissioner supported the original modification of the replacement plan, subsequent cases have highlighted the need for enhanced scrutiny of all replacement programs. This Commissioner strongly encourages Laclede to make a concerted effort to replace significantly more unprotected steel main than is minimally

required. The safety of Laclede's customers, employees and the general public is of the utmost importance.

This Commissioner respectfully submits this Concurrence.

Respectfully submitted,


Robert M. Clayton III
Commissioner

Dated at Jefferson City, Missouri,
on this 28th day of April, 2006.