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October 4, 2001

ROBERT K. ANGSTEAD MARK W. COMLEY CATHLEEN A. MARTIN STEPHEN G. NEWMAN JOHN A. RUTH ALICIA ÉMBLEY TURNER

> The Honorable Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102-0360

Re:

Case No. GO-2000-394

Dear Judge Roberts:

Please find enclosed for filing in the above-referenced matter a Motion to Suspend Procedural Schedule and Terminate Proceeding.

Would you please see that this filing is brought to the attention of the appropriate Commission personnel.

Thank you.

Sincerely,

NEWMAN, COMLEY & RUTH P.C.

By:

comleym@ncrpc.com

MWC:ab Enclosure

cc: Hon. Vicky Ruth

Doug Micheel, Office of Public Counsel Thomas Schwarz, General Counsel's Office

Michael C. Pendergast

BEFORE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

N	FILED
	007 0 1 200
00	Service Commission

In the Matter of Laclede Gas Company Experimental Price Stabilization Fund.

Case No. GO-2000-394

MOTION TO SUSPEND PROCEDURAL SCHEDULE AND TERMINATE PROCEEDING

COMES NOW Laclede Gas Company ("Laclede" or "Company") pursuant to 4
CSR 240-2.080 and in support of this Motion to Suspend Procedural Schedule and
Terminate Proceeding in the above-captioned case, states as follows:

- 1. By Order dated February 13, 2001, the Commission directed that a procedural schedule be established to consider Laclede's proposal that the Price Stabilization Program ("PSP") be extended for a fourth year.
- 2. Pursuant to the Commission's Order, the Company, the Staff ("Staff") of the Missouri Public Service Commission ("Commission") and the Office of the Public Counsel ("Public Counsel"), filed their proposed procedural schedule, on March 7, 2001, which the Commission subsequently adopted by an order issued March 14, 2001.
- 3. On August 23, 2001, the Staff of the Commission filed, on behalf of the parties, a Motion to Modify Procedural Schedule, which was granted by the Commission on September 5, 2001.
- 4. On September 20, 2001, the Commission issued a Report and Order in Case No. GT-2001-329 involving Laclede's Gas Supply Incentive Plan ("GSIP"), in which it, among other things, expressed concern about establishing preapproved



parameters for purchasing financial instruments. In addition, on October 1, 2001 the Commission issued a press release in which it stated that:

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Properly structured incentive plans for natural gas companies under Missouri Public Service Commission jurisdiction will be the focus of a natural gas roundtable to be hosted by the Commission on October 26, 2001, in Jefferson City.

- fruitful to expend further resources pursuing an extension of the PSP for a fourth year.

 While Laclede believes that its PSP has been beneficial for both the Company and its customers, the upcoming roundtable will provide an opportunity for the parties to better understand the Commission's desires when addressing issues that are present in this case.

 Until such time as the Commission provides additional insight as to what may or may not be acceptable as a workable incentive plan, administrative economy dictates that all parties involved can better utilize their resources by concentrating on other matters.

 Laclede accordingly requests that the Commission issue an Order terminating this proceeding.
- 6. Pending Commission action on its request to terminate this proceeding,
 Laclede also requests that the procedural schedule in case be suspended.
- 7. Laclede has contacted counsel for both the Staff and Public Counsel and both have stated that they have no objection to terminating this proceeding.

Wherefore, for the foregoing reasons, Laclede Gas Company respectfully requests that the Commission grant this motion to terminate this proceeding and pending

such action suspend the procedural schedule previously established herein.

Respectfully submitted,

Michael C. Pendergast #31963 Assistant Vice President and

Associate General Counsel

Laclede Gas Company

720 Olive Street, Room 1520

St. Louis, MO 63101

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CERTIFICATE OF SERVICE

Michael C. Pendergast, Assistant Vice President and Associate General Counsel for Laclede Gas Company, hereby certifies that the foregoing Motion to Suspend Procedural Schedule and Terminate Proceeding has been duly served upon the General Counsel of the Staff of the Public Service Commission, Office of the Public Counsel and all parties of record to this proceeding by placing a copy thereof in the United States mail, postage prepaid, or by hand delivery, on this 4th day of October, 2001.