

**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 Unprotected       )  
Steel Main Replacement Program             )  
Previously Approved Pursuant to Rule 4       )  
CSR 240-40.030(15)(E)                       )  
  )

**Case No. GO-2003-0506**

**STATUS REPORT REGARDING SIXTH ANNUAL REPORT**

**COMES NOW** the Staff of the Missouri Public Service Commission and for its Status Report respectfully states:

1.       On March 5, 2004, the Commission issued its *Report And Order* in the above-captioned case approving the application filed by Laclede Gas Company (Laclede) and modifying the replacement program as follows:

For unprotected steel mains that meet the criteria in Commission Rule 4 CSR 240 40.030(15)(E)3. through (15)(E)6., Laclede Gas Company shall replace such mains at an average annual rate of 10,000 feet until all remaining mains identified by this section have been replaced.

Further, the Staff of the Commission was directed to file annual status reports regarding progress with regards to the unprotected steel main replacement program. Staff has filed five previous annual reports to date and those reports have been accepted by the Commission.

2.       On April 12, 2004, the Staff filed its first Status Report reporting that during Fiscal Year 2003, Laclede eliminated 10,532 feet of unprotected steel main that met the criteria of paragraphs 4 CSR 240-40.030(15)(E)3. through (15)(E)6.

3. On April 15, 2005, the Staff filed its second Status Report reporting that during Fiscal Year 2004, Laclede eliminated 10,300 feet of unprotected steel main that met the criteria of paragraphs 4 CSR 240-40.030(15)(E)3. through (15)(E)6.

4. On April 20, 2006, the Staff filed its third Status Report reporting that during Fiscal Year 2005, Laclede eliminated 10,370 feet of unprotected steel main that met the criteria of paragraphs 4 CSR 240-40.030(15)(E)3. through (15)(E)6.

5. On May 1, 2007, the Staff filed its fourth Status Report reporting that during Fiscal Year 2006, Laclede eliminated 9,675 feet of unprotected steel main that met the criteria of paragraphs 4 CSR 240-40.030(15)(E)3. through (15)(E)6.

6. On April 21, 2008, the Staff filed its fifth Status Report reporting that during Fiscal Year 2007, Laclede eliminated 10,375 feet of unprotected steel main that met the criteria of paragraphs 4 CSR 240-40.030(15)(E)3. through (15)(E)6.

7. On April 30, 2008, the Commission issued its *Order Regarding Status Report And Directing Filing* ordering the Staff to file its next (sixth) annual Status Report no later than May 4, 2009.

8. During Fiscal Year 2008, Laclede eliminated 10,503 feet of unprotected steel main that met the criteria of paragraphs 4 CSR 240-40.030(15)(E)3. through (15)(E)6. This results in an annual average rate of 10,293 feet for Fiscal Years 2003, 2004, 2005, 2006, 2007, and 2008, which exceeds the required annual average rate of 10,000 feet. Laclede also notified Staff that 61,639 feet of unprotected steel main remained at the end of Fiscal Year 2008.

WHEREFORE, the Staff submits its Status Report to the Commission as directed by the Commission Order of April 30, 2008.

Respectfully submitted,

**/s/ Robert S. Berlin**

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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 4th day of May 2009.

**/s/ Robert S. Berlin**