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October 31, 2002

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

FILED³
OCT 31 2002

Re: Case No. GT-2003-0117

**Missouri Public
Service Commission**

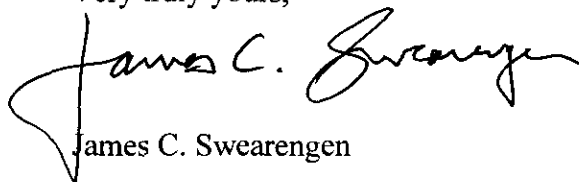
Dear Mr. Roberts:

Enclosed for filing on behalf of Laclede Gas Company, please find an original and eight (8) copies of a Response to Staff's Request.

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

I thank you in advance for your cooperation in this matter.

Very truly yours,


James C. Swearengen

JCS/lar

Enclosure

cc: John Coffman
Lera Shemwell

FILED³

OCT 31 2002

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

Missouri Public
Service Commission

In the Matter of the Tariff Filing of)
Laclede Gas Company to Implement)
An Experimental Low Income Assistance) Case No. GT-2003-0117
Program called Catch-Up/Keep-Up)

LACLEDE GAS COMPANY'S
RESPONSE TO STAFF'S REQUEST

COMES NOW Laclede Gas Company ("Laclede" or "Company"), and for its Response to Staff's Request to Clarify Whether Local Public Hearings Should be Scheduled as Part of the Procedural Schedule in this Case and Request for Expedited Treatment, states as follows:

1. On or about October 25, 2002, the Staff filed an unusual request seeking guidance on whether local public hearings should be included as part of the procedural schedule in this case.

2. To Laclede's knowledge, it has never been a general practice of the Commission to schedule local public hearings in non-rate case proceedings and it is not at all apparent to the Company why there is a special need to make an exception in this case. The Company would note that its proposed Catch-up/Keep-up Program (the "Program") has been on file with the Commission, in one form or another, since late July of this year. A number of newspaper articles have been written about the Program and, as Staff itself notes, those desiring to comment on the Program have already had an opportunity to do so during the local public hearings that were held in August of this year in Laclede's general rate case proceeding. In addition, the Company has already sought

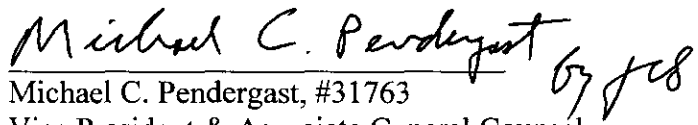
and received input regarding the Program from social service agency personnel and others who would be directly involved in the program through the discussions it has held since the inception of the Program. Under such circumstances, Laclede is concerned that devoting additional resources and time to scheduling, advertising and holding even more local public hearings at this late stage will serve no purpose other than to further delay the day when its most vulnerable customers will hopefully be able to start receiving some assistance from such a program. Laclede is convinced that as the winter approaches and the weather turns colder, its customers are far more interested in receiving actual help from such a Program than they are in having yet another opportunity to talk about it.

3. And this point was brought home during the same local public hearings in Laclede's rate case that Staff cited in its Request as a reason for raising its point of clarification. While one member of Heat-up St. Louis did mention a desire to have a subsequent public hearing on the Catch-up/Keep-up Program, it was unclear what more he wanted to say or could say about the Program in addition to the testimony provided at that hearing. On the other hand, Jacqueline Hutchenson, the director of the Energy Crisis Intervention Program for the Human Development Corporation in St. Louis stated that there were approximately 93,000 households in the City of St. Louis that were living at or below the poverty level of \$995 per month (for a family of three) that would stand to benefit from additional energy assistance and other low-income programs. (Case No. GR-2002-356; Transcript of Proceedings, Volume 4, pp. 14-20). She also testified that the clients served by her agency had an average household income of \$645 per month and arrearages of around \$1000 -- factors that made it impossible for them to catch up and make the payments necessary to retain utility service under standard payment plans. *Id.*

at. 20. In Laclede's view, this evidence suggest that expeditious consideration and approval of the Catch-up/Keep-up Program is far more important to far more people than is the scheduling of local public hearings in this matter.

WHEREFORE, for the foregoing reasons, Laclede Gas Company respectfully requests that the Commission decline Staff's requested clarification.

Respectfully Submitted,



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Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing Response was served on the General Counsel of the Staff of the Missouri Public Service Commission on this 31ST day of October, 2002 and the other parties of record to this case by hand-delivery or by placing a copy of such Response, postage prepaid, in the United States mail.

