## 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	)	Case No. GS-2008-0038
soft copper service line replacement	)	
program previously approved pursuant	)	
to Case No. GO 99-155 and as	)	
revised by Case No. GS-2008-0038.	)	

## STAFF'S MOTION TO SUBSTITUTE CORRECTED ANNUAL REPORT

COMES NOW the Staff of the Missouri Public Service Commission and files its Corrected Annual Report for the Staff Report filed earlier this morning. In support of its Motion Staff states:

- 1. Staff was contacted by Laclede to correct the statement that the direct buried service line replacement program would end in March 2010.
- 2. Assuming Laclede replaces 7,000 service lines (the minimum required) in the twelve months ending March 1, 2010, Laclede will have approximately 1,500 direct-buried copper service lines remaining to be replaced.
- 3. This means the program will not officially end until sometime later in 2010, at which time Staff will report the conclusion of the program to the Commission.
- 4. As always, if at any time the leakage rate increases or if 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 the Commission accept Staff's Corrected Annual Report and order substitution of this revised Report for the Staff

Report filed earlier today. Staff recommends that when the substitution is made, the earlier version be removed from EFIS to eliminate any confusion.

Respectfully submitted,

## /s/ Lera L. Shemwell

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## Certificate of Service

I hereby certify that copies of the foregoing have been mailed, sent by facsimile, sent by email or hand-delivered to all counsel of record this 18<sup>th</sup> day of September, 2009.

/s/ Lera L. Shemwell