

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Verified Application)	
and Petition of Laclede Gas Company)	Case No. GO-2008-0155
to Change its Infrastructure System)	
Replacement Surcharge)	

STAFF RECOMMENDATION CONCERNING NOTICE PROVISIONS

COMES NOW the Staff and for its recommendation concerning the proposed notice for Laclede Gas Company's (Laclede or Company) November 9, 2007 ISRS tariff filing states:

1. On November 16, 2007, Laclede Gas Company (Laclede or Company) filed its Request for Approval of Customer Notices, and submitted various components that Laclede asserts complies with the notice requirements in the Commission Rules. This is a separate notice requirement, but pertains to Laclede's pending ISRS filing GO-2008-0155.

2. On January 7, 2008, the Commission issued its Order Establishing Time to Respond to Staff Recommendation and Directing Staff to Respond to Motion to Approve Customer Notices. It contained the following:

3. In its Request, Laclede asserts: "Section 22 of the ISRS Rule also requires Laclede to provide information regarding ISRS information on its website, along with ISRS-related call center instructions. This information has been provided to Staff and Public Counsel. As opposed to the information provided pursuant to Section 9 of the ISRS Rule, this information is not submitted for approval, nor is it clear whether this information should even be filed." Nevertheless, Laclede is attaching

hereto the ISRS information used by its call center (Attachment 4, pp. 1-9) and the ISRS information on its website (Attachment 4, p. 10). This information will be updated following a Commission order approving an ISRS in this case.

4. Staff disagrees with this interpretation of the existing Rules. The Rule states the following about ISRS information to be used by its call center and the ISRS information on the Company's website:

4 CSR 240-3.265:

(22) In addition to the information required by section (20) of this rule, the natural gas utility shall also provide the following information **when it files a petition** with the commission seeking to establish, change or reconcile an ISRS:

(A) A description of all information posted on the subject utility's website regarding the infrastructure system replacement surcharge and related infrastructure system replacement projects; and

(B) A description of all instructions provided to personnel at the subject utility's call center regarding how those personnel should respond to calls pertaining to the ISRS. (emphasis added)

5. After Staff advised Laclede of Staff's position, the Company filed a pleading on January 10, 2008, in which it represented that it would file such information with the Commission at the time it files an ISRS petition in the future, notwithstanding the Company's view that such action might not be technically required. Staff therefore recommends that the Commission order Laclede to file such information when Laclede files a petition for an ISRS in the future.

6. In its pleading on January 10, 2008, Laclede also submitted updated call center information that: (a) matches the rates developed in the pending ISRS filing which Staff has recommended be approved; and (b) updates and corrects inconsistencies in the call center instructions, such as references to the miles of pipelines used by Laclede to distribute natural gas.

7. Staff recommends the following:

1. The Commission should direct Laclede to file call center instructions and website information at the time it files an ISRS petition in the future.

2. The Commission should approve the notices submitted by Laclede with its Request on November 16, 2007.

WHEREFORE, for the foregoing reasons, the Staff recommends that the Commission approve the notices submitted by Laclede and order Laclede to file call center instructions and website information at the time it files its next ISRS petition.

Respectfully submitted,

/s/ Lera L. Shemwell

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 10th day of January, 2008.

/s/ Lera L. Shemwell