

LACLEDE GAS COMPANY
720 OLIVE STREET
ST. LOUIS, MISSOURI 63101

AREA CODE 314
342-0532

MICHAEL C. PENDERGAST
ASSOCIATE GENERAL COUNSEL

January 10, 2000

VIA FACSIMILIE

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Harry S Truman Building
301 W. High Street, 5th Floor
Jefferson City, MO 65101

FILED²
JAN 10 2000
Missouri Public
Service Commission

RE: Case No. GO-2000-395

Dear Mr. Roberts:

Enclosed for filing, please find the original and fourteen copies of the Response of Laclede Gas Company to Staff's Motion to Open Docket in the above-referenced case. Please see that this filing is brought to the attention of the appropriate Commission personnel.

Laclede notes that it is filing copies of a facsimile transmission of its Response pursuant to 4 CSR 240-2.080(3). In accordance with that rule, the original of this Response and this letter are being sent to the Commission by next-day mail.

Thank you for your consideration in this matter.

Sincerely,


Michael C. Pendergast

MCP:jaa

cc: Office of the Public Counsel

Enclosure

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²
JAN 10 2000

Missouri Public
Service Commission

In the Matter of Laclede Gas Company's)
Gas Supply Incentive Plan (GSIP II)) Case No. GO-2000-395

**RESPONSE OF LACLEDE GAS COMPANY
TO STAFF'S MOTION TO OPEN DOCKET**

COMES NOW, Laclede Gas Company ("Laclede" or "Company") and for its Response to Staff's Motion to Open Docket in the above captioned-case, states as follows:

1. On December 29, 1999, the Staff of the Missouri Public Service Commission ("Staff") filed a Motion to Open Docket for the purpose of monitoring the Company's Gas Supply Incentive Plan ("GSIP II") as approved by the Commission in its Report and Order dated September 9, 1999 in Case No. GT-99-303.
2. Laclede has no objection to opening a case for the purposes suggested by Staff. Laclede does, however, request that the Commission address two items in any Order opening such a case. First, Laclede requests that the Commission issue its Standard Protective Order since the Company anticipates that much of the information requested by Staff will involve commercially-sensitive matters relating to the Company's procurement of gas supplies and associated services. Given the competitive harm that public disclosure of such information could cause Laclede and its customers, and the Commission's prior practices of issuing such protective orders under similar circumstances, Laclede believes good reason exists to issue such an order in this case.

3. Second, Laclede requests that the Commission adopt a procedure similar to what it has followed in the past for monitoring the Company's Gas Supply Incentive Plan. Specifically, Laclede requests that it be required to file an annual monitoring report showing the results achieved under the first year of operation of the GSIP II at the time it makes its annual 1999/2000 ACA filing in November of this year. In making such a filing, Laclede proposes to use the form of monitoring report previously approved by the Commission in connection with the Company's prior GSIP filings, with sections added or deleted to reflect the specific incentive components approved by the Commission in its September 9, 1999 Report and Order. Laclede further requests that Staff's audit of this GSIP II filing and the Company's performance thereunder be conducted at the same time it conducts its audit of the Company's 1999/2000 ACA filing. In addition to being consistent with the Commission's past practice in this area, such an approach should also serve to avoid duplicative and repetitive audits of the same information by permitting a single and contemporaneous audit of all of the Company's gas procurement activities during the 1999/2000 ACA. To further facilitate Staff's and Public Counsel's monitoring of the GSIP II, the Company also proposes to make available to both parties on a quarterly basis, summaries of the results achieved by the Company under the GSIP II for the preceding fiscal quarter. Laclede would propose to provide the first quarterly report on February 1, 2000 for the quarterly period ending December 31, 1999.

WHEREFORE, for the foregoing reasons, Laclede Gas Company respectfully requests that the Commission issue its Order: (a) granting Staff's Motion to Open Docket; (b) issuing its Standard Protective Order in this case; and (c) establishing the

procedure recommended herein for the filing of a GSIP II Monitoring Report and Staff's audit of the Company's performance thereunder.

Respectfully submitted,

A handwritten signature in cursive script, reading "Michael C. Pendergast", is written over a horizontal line.

Michael C. Pendergast #31763
Laclede Gas Company
720 Olive Street, Room 1520
St. Louis, MO 63101
(314) 342-0532 Phone
(314) 421-1979 Fax

CERTIFICATE OF SERVICE

Michael C. Pendergast, Assistant Vice President-Associate General Counsel for Laclede Gas Company, hereby certifies that the foregoing Response of Laclede Gas Company to Staff's Motion to Open Docket has been duly served upon 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 10th day of January, 2000.

A handwritten signature in cursive script, reading "Michael C. Pendergast", is written over a horizontal line.