

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

JOHN MOTEN, JR.  
SENIOR VICE PRESIDENT  
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September 23, 2002

**VIA HAND DELIVERY**

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
Governor Office Building  
200 Madison Street  
Jefferson City, MO 65101

**FILED<sup>3</sup>**

**SEP 23 2002**

**Missouri Public  
Service Commission**

Dear Mr. Roberts:

Enclosed herewith for filing with the Missouri Public Service Commission ("Commission") are the following revised tariff sheets which are applicable to all divisions of Laclede Gas Company ("Company").

P.S.C. MO. No. 5 Consolidated, Original Sheet No. 28-h  
P.S.C. MO. No. 5 Consolidated, Original Sheet No. 28-i  
P.S.C. MO. No. 5 Consolidated, Original Sheet No. 28-j  
P.S.C. MO. No. 5 Consolidated, Original Sheet No. 28-k

These tariff sheets, which have an issue date of September 23, 2002 and an effective date of October 24, 2002, are being filed to implement a Catch-Up/Keep-Up Program (the "Program") for eligible, low-income customers. The purpose of the Program is to assist eligible, low-income customers, through financial assistance, conservation, and education in managing their energy bills in a manner that will eliminate their arrearages for natural gas service over time, ensure their continued access to natural gas service under manageable terms, and ultimately reduce the level of uncollectibles experienced by the Company for the benefit of all customers.

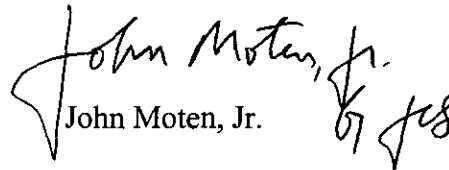
On September 18, 2002 the Company withdrew the tariff sheets the Company originally filed to implement the Program. As described in more detail in the accompanying motion, the enclosed sheets have been modified to reflect various suggestions the Company received in response to its original filing.

September 23, 2002

Even though the enclosed sheets bear an effective date of October 24, 2002, the Company requests that such sheets be made effective in less than thirty days on October 15, 2002 for good cause shown as set forth in the accompanying motion.

For the Commission's convenience, I have enclosed three copies of this filing, one of which is for your convenience in acknowledging your receipt thereof.

Sincerely,

  
John Moten, Jr.

Enclosures

cc: Office of the Public Counsel

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September 23, 2002

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

**FILED<sup>3</sup>**

SEP 23 2002

**Re: Laclede Gas Company  
Catch-Up/Keep Up Program**

**Missouri Public  
Service Commission**

Dear Mr. Roberts:

Enclosed for filing with the Missouri Public Service Commission ("Commission") on behalf of Laclede Gas Company ("Laclede" or "Company"), please find three (3) copies of the following tariff sheets:

P.S.C. MO. No. 5 Consolidated, Original Sheet No. 28-h  
P.S.C. MO. No. 5 Consolidated, Original Sheet No. 28-i  
P.S.C. MO. No. 5 Consolidated, Original Sheet No. 28-j  
P.S.C. MO. No. 5 Consolidated, Original Sheet No. 28-k

The tariff sheets bear an issue date of September 23, 2002 and an effective date of October 24, 2002. Included is a letter from John Moten, Jr., Laclede's Senior Vice President Operations and Marketing, which, among other things, explains the purpose of the filing.

Also enclosed for filing please find an original and eight (8) copies of Laclede's Verified Motion for Approval of Tariff Filing on Less than Thirty Days' Notice and For Expedited Treatment.


Please note that Attachment 1 to the Verified Motion includes an Affidavit of John Moten, Jr., and a copy of the St. Louis Area Energy Assistance Guide. Attachment 1 also includes an Affidavit of Michael T. Cline, Laclede's Director-Tariff & Rate Administration. Attachment 2 to the Verified Motion consists of copies of pleadings previously filed with the Commission by Laclede and the Commission Staff in Docket No. GT-2003-0064. Attachment 3 to the Verified Motion consists of tariffs now on file with the Commission concerning Laclede's Weatherization Program.

A copy of the subject tariff sheets and Verified Motion with attachments are being provided this date to the Commission's General Counsel and also to the Office of the Public Counsel.

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: Office of the Public Counsel  
General Counsel

**P.S.C. MO. No. 5 Consolidated, Original Sheet No. 28-h**  
**CANCELLING All Previous Schedules.**

Laclede Gas Company  
Name of Issuing Corporation or Municipality

For Refer to Sheet No. 1  
Community, Town or City

**SCHEDULE OF RATES**

**H. Experimental Low-Income Bill Stabilization and Assistance Program**

1. Description and Purpose - Subject to the terms and conditions of this tariff, the Company shall implement an experimental low income bill stabilization and assistance program called the Catch-up/Keep-up Program (the "Program") for eligible, low-income customers upon the effective date of this tariff. The purpose of the Program is to assist eligible, low-income customers, through financial assistance, conservation, and education in managing their energy bills in a manner that will provide them with an opportunity to eliminate their arrearages for natural gas service over time, ensure their continued access to natural gas service under manageable terms, and ultimately reduce the level of uncollectibles experienced by the Company for the benefit of all customers. To that end, the Program will work in partnership with Dollar-Help and social service agencies that customarily distribute governmental sources of low-income energy assistance (the "Agencies") to provide eligible customers with grants that will be applied to reduce their arrearages as measured on the date they first entered the Program. In order to receive such grants, customers must agree to apply for other forms of energy assistance for which they may be eligible, make timely and full payments of their current charges for natural gas service which will be computed on a twelve (12) month levelized basis in accordance with the Company's budget billing procedures, unless prevented from doing so by extenuating circumstances, and agree to implement any available, cost free energy conservation measures.

2. Program Funding - An amount equal to thirty percent (30%), up to an annual cap of Six Million Dollars (\$6,000,000), of the discounts achieved by the Company from the maximum, year round, firm transportation and storage rates charged by its interstate and intrastate pipeline suppliers during the 2001/2002 Actual Cost Adjustment ("ACA") period and each subsequent ACA period thereafter shall be used to fund the Program (the "Program Funds"). Such amounts shall be deposited in a separate escrow account as they are reflected in the Company's ACA in accordance with Section 4 and shall be used, together with any interest net of applicable taxes, solely to fund the Program. The Program shall be administered pursuant to written contracts between Laclede, Dollar-Help and the Agencies.

3. Terms and Conditions - The written contracts executed to administer the Program shall be subject to review by Staff and the Office of the Public Counsel and shall provide that the Program Funds be disbursed upon the following terms and conditions:

DATE OF ISSUE	September 23, 2002 Month Day Year	DATE EFFECTIVE	October 24, 2002 Month Day Year
ISSUED BY	John Moten, Jr. Senior Vice President,	720 Olive St.,	St. Louis, MO 63101
	Name of Officer	Title	Address

**P.S.C. MO. No. 5 Consolidated, Original Sheet No. 28-i**  
**CANCELLING All Previous Schedules.**

Laclede Gas Company

Name of Issuing Corporation or Municipality

For

Refer to Sheet No. 1

Community, Town or City

**SCHEDULE OF RATES**

**H. Experimental Low-Income Bill Stabilization and Assistance Program (continued)**

a. All Program Funds shall be dedicated to reducing the natural gas service arrearages and energy consumption of residential customers receiving service from the Company in St. Louis City and the surrounding counties of St. Louis, St. Charles, Crawford, Jefferson, Franklin, Iron, Ste. Genevieve, St. Francois, Madison and Butler in Eastern Missouri. The disbursement of such Program Funds shall be coordinated with Dollar-Help and the Agencies. Measures shall be taken to ensure that the assistance made available through such Program Funds is provided on behalf of residential customers residing in households with income less than or equal to one hundred and seventy five percent (175%) of the federal poverty level, provided that the income threshold for eligibility may be raised in the event and to the extent Program Funds remain available after satisfying those customers with incomes at or below the threshold. Measures shall also be taken to ensure, to the extent practical, that the use of such Program Funds does not result in any material reduction in the share of state and federal energy assistance that the Company would otherwise expect to receive on behalf of its customers.

b. The total amount of Program Funds distributed on behalf of any single household for any quarterly period shall not exceed three-hundred and seventy five dollars (\$375).

c. To qualify for such quarterly payments, the customer receiving the assistance or other household member must, unless otherwise prevented from doing so due to extenuating circumstances:

- i. First apply for other forms of energy assistance for which the customer may be eligible, which energy assistance shall be applied in determining whether the customer has satisfied the payment obligations hereunder;
- ii. have, after entering the Program, made three consecutive timely and full payments (including the initial payment) of the customer's current estimated charges for natural gas service, which payments shall be computed on a 12-month levelized basis in accordance with the Company's budget billing procedures;
- iii. not break a previous payment agreement entered into under the Program; and
- iv. agree to review and implement, where feasible, a submitted list of standard, cost-free energy conservation measures designed to reduce the customer's consumption of energy.

DATE OF ISSUE      September 23, 2002  
Month    Day    Year

DATE EFFECTIVE      October 24, 2002  
Month    Day    Year

ISSUED BY      John Moten, Jr.,      Senior Vice President,      720 Olive St.,      St. Louis, MO 63101  
Name of Officer      Title      Address

**P.S.C. MO. No. 5 Consolidated, Original Sheet No. 28-j  
CANCELLING All Previous Schedules.**

**Laclede Gas Company**  
Name of Issuing Corporation or Municipality

For

**Refer to Sheet No. 1**  
Community, Town or City

**SCHEDULE OF RATES**

**H. Experimental Low-Income Bill Stabilization and Assistance Program (continued)**

d. The Company shall, to the extent reasonably practical and if requested by the Customer, provide a delayed payment date if required to accommodate the customer's income schedule.

e. Program Funds will not be used for administrative purposes except those incurred by third parties to advise customers of, and implement, energy conservation/weatherization measures, monitor steps taken by customers to implement such measures, and perform customer outreach, intake, and bill payment counseling activities. The total amount expended on such measures shall not exceed Six Hundred Thousand Dollars (\$600,000) per Program year. The Company will cooperate with the Staff, the Office of the Public Counsel, Dollar-Help, the Agencies and the Department of Natural Resources to develop and submit such measures to the Commission for its approval within sixty (60) days of the effective date of this Tariff.

f. With the assistance of Dollar-Help and the Agencies, the Company shall submit an annual report on the Program to the Staff and the Office of the Public Counsel within sixty (60) days of the conclusion of each year of the Program. Each annual report, which shall be subject to audit by Staff and Public Counsel, will include the following information:

- i. Total amount of Program Funds expended during the preceding year of the Program.
- ii. Total number of customers receiving energy assistance as a result of the Program during the preceding year of the Program.
- iii. Average amount of energy assistance received by customers under the Program.
- iv. Amount of administrative funds spent on energy conservation/weatherization, customer outreach and bill payment counseling efforts.
- v. To the extent available, information detailing the impact of the Program on reducing customer arrearages, encouraging conservation, and lessening uncollectible expense.

DATE OF ISSUE **September 23, 2002**  
Month Day Year

DATE EFFECTIVE **October 24, 2002**  
Month Day Year

ISSUED BY **John Moten, Jr., Senior Vice President, 720 Olive St., St. Louis, MO 63101**  
Name of Officer Title Address

**P.S.C. MO. No. 5 Consolidated, Original Sheet No. 28-k**  
**CANCELLING All Previous Schedules.**

Laclede Gas Company

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Community, Town or City

**SCHEDULE OF RATES**

**H. Experimental Low-Income Bill Stabilization and Assistance Program (continued)**

g. If and at such time as this Program terminates, any Program Funds that remain unused and uncommitted at the end of the twelve month period following termination shall be credited to the Company's Deferred Purchased Gas Cost Account and flowed through to all firm sales customers under the Company's Purchased Gas Adjustment Clause.

4. Accounting - The Company shall debit the Low-Income Funding ("LIF") Account and credit the Low-Income Deferred Credit Account with 30% of the discounts it achieves up to an annual cap of Six Million Dollars (\$6,000,000). The debits to the LIF Account shall be allocated to firm sales customers. For each ACA year, the debits recorded in the LIF Account including any remaining balance from the previous year shall be accumulated to produce a cumulative LIF balance. For purposes of computing new ACA factors for the subsequent twelve-month period beginning with the effective date of the Winter PGA, such cumulative LIF balance shall be combined with the appropriate Deferred Purchased Gas Costs Account balances. The Company shall separately record that portion of ACA revenue recovery which is attributable to recovery of the LIF balance. Any remaining LIF balance shall be reflected in the subsequent ACA computations.

5. Rights of Parties - The Company, Staff and Public Counsel shall be free in any future complaint case or rate case proceeding to propose prospective elimination of, or modifications to, the Program to be effective at the time new base rates are established and without any burden of proof or presumption applying to the determination of whether the Program, or an alternative program, should be approved by the Commission.

DATE OF ISSUE September 23, 2002

Month Day Year

DATE EFFECTIVE October 24, 2002

Month Day Year

ISSUED BY

John Moten, Jr., Senior Vice President, 720 Olive St., St. Louis, MO 63101

Name of Officer

Title

Address