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June 30, 2000

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

FILED

JUN 30 2000

Missouri Public
Service Commission

Re: Case No. GR-2000-622

Dear Judge Roberts:

Enclosed for filing please find the original and eight copies of a Motion for Waiver to Make an Unscheduled Summer Purchased Gas Adjustment Filing.

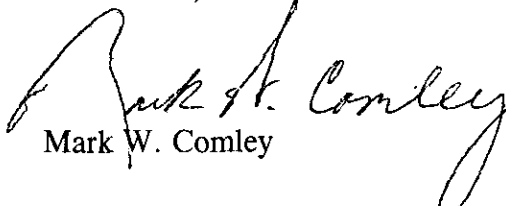
Would you please see that this filing is brought to the attention of the appropriate Commission personnel.

Thank you.

Very truly yours,

NEWMAN, COMLEY & RUTH P.C.

By:


Mark W. Comley

MWC:ab

Enclosure

cc: Office of Public Counsel
Michael C. Pendergast
General Counsel's Office

FILED

JUN 30 2000

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Public
Service Commission

In the Matter of Laclede Gas Company's)
Purchased Gas Adjustment Factors to be) Case No. GR-2000-622
Reviewed in its 1999-2000 Actual Cost)
Adjustment)

**MOTION FOR WAIVER TO MAKE AN UNSCHEDULED
SUMMER PURCHASED GAS ADJUSTMENT FILING**

COMES NOW Laclede Gas Company ("Laclede" or "Company") and in support of its Motion for Waiver to Make an Unscheduled Summer Purchased Gas Adjustment Filing, states as follows:

1. Pursuant to the Stipulation and Agreement ("S&A") approved by the Commission in Case No. GO-97-401, the Company's tariff provides that the Company may only make two scheduled Purchased Gas Adjustment ("PGA") filings each year, one in the spring and one in the fall. In addition, Laclede's tariff permits the Company to make one unscheduled PGA filing during the winter period if certain conditions are met. *See In the Matter of the Operation of Laclede Gas Company's Purchased Gas Adjustment Clause*, Case No. GO-97-401, *Order Approving Stipulation and Agreement* (July 18, 1997). The S&A approved by the Commission also indicated that nothing in the S&A was intended to affect Laclede's rights to seek a variance or waiver from the Company's PGA tariff provisions. *See* Section IV. B. of the S&A, which is attached to the *Order Approving Stipulation and Agreement* in Case No. GO-97-401.

2. The purpose of this Motion is to request that the Commission grant such a waiver, pursuant to its general authority under §393.140(11) RSMo. (1994), so as to permit Laclede to make the unscheduled summer PGA filing that has been

contemporaneously submitted by the Company on this date. As explained in the transmittal letter accompanying its unscheduled summer PGA filing. Since the S&A was approved in the summer of 1997, Laclede has made only eight PGA filings in total. Moreover, Laclede has managed to keep its PGA rates for residential customers at virtually the same level since the Company made its scheduled PGA winter filing last November.

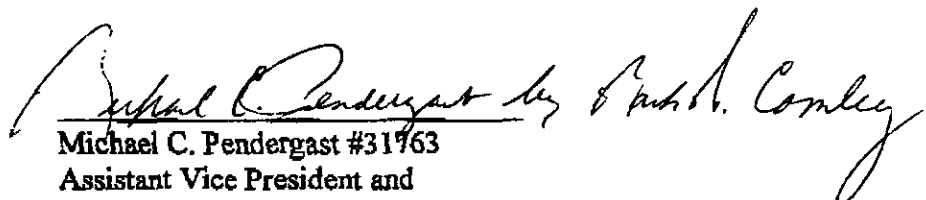
3. As the Commission knows, however, there have been substantial escalations in the market price of gas throughout the spring and summer of this year. In fact, current market conditions require Laclede to pay in excess of \$4 per MMBtu for the gas supplies it is purchasing in the marketplace to meet its customers' requirements, despite the Company's continuing efforts to reduce its costs under its gas supply incentive plan. This is nearly \$1.70 more than the gas supply cost reflected in Laclede's current PGA rates. As a result of this disparity, Laclede's payments for gas supplies are currently exceeding its receipts for gas service by some \$100,000 per day. This is in addition to the cash shortfall incurred by Laclede to inject gas into storage.

4. As Laclede has previously advised the Commission, these substantial increases in gas prices are due to a number of factors, including reduced gas storage inventories, sharp increases in the price of alternative fuels, and the demands placed on gas supplies by new gas fueled electric generation. Whatever the causes, Laclede is continuing to work with the Staff and other interested parties to develop alternative measures for obtaining price protection for its customers in advance of the upcoming winter heating season.

5. In the meantime, however, Laclede believes it is both necessary and appropriate to make and implement the unscheduled summer PGA filing submitted on this date. Implementation of the filing will help mitigate the current under-recovery of gas costs and lessen the magnitude of any increase that may be required in the Company's scheduled winter PGA filing. It will also serve to send an appropriate price signal to Laclede's customers and make them more aware of possible increases in the cost of gas service this coming winter. Laclede accordingly requests that the Commission grant this motion to make an unscheduled summer PGA filing for good cause shown and permit the associated tariff sheet to go into effect within ten business days in compliance with the filing procedures set forth in Laclede's PGA tariff.

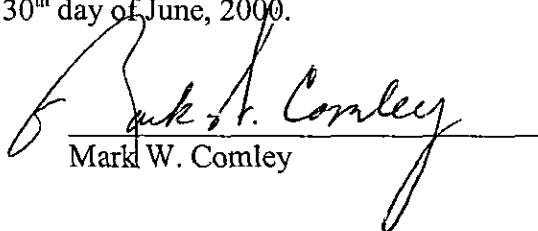
WHEREFORE, for the foregoing reasons, Laclede respectfully requests that the Commission issue its Order granting the Company's Motion for Waiver to Make an Unscheduled Summer Purchased Gas Adjustment Filing and permit the PGA tariff sheet filed on this date to become effective on its stated effective date.

Respectfully submitted,


Michael C. Pendergast #31763
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(314) 342-0536 Phone
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Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand delivered, to Office of Public Counsel, P.O. Box 7800, Jefferson City, MO 65102; and General Counsel's Office, Public Service Commission, P.O. Box 360, Jefferson City, MO 65102, on this 30th day of June, 2000.


Mark W. Comley