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Missouri Public Service Commission

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January 23, 2001

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DALE HARDY ROBERTS Secretary/Chief Regulatory Law Judge

> DANA K. JOYCE General Counsel

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

RE: Case No. GO-2000-394

Dear Mr. Roberts:

FILED²

JAN 2 3 2001

Service Commission

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a MOTION FOR LEAVE TO FILE REPLY OUT OF TIME.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Thomas R. Schwarz, Jr.

Thomas R. Schwar

Deputy General Counsel

(573) 751-5239

(573) 751-9285 (Fax)

TRS:sw Enclosure

cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

FILED²

JAN 2 3 2001

Missouri Public

Vice Company

In the Matter of Laclede Gas Company's Experimental Price Stabilization Fund.

Case No. GO-2000-394

MOTION FOR LEAVE TO FILE REPLY OUT OF TIME

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission") and moves the Commission for leave to file out of time a reply to the Response filed by Laclede Gas Company ("Laclede") filed on January 5, 2001.

Staff received supporting information from Laclede with respect to Laclede's January 5 Response on January 12 and January 16, 2001. Staff has reviewed the supporting information as quickly as possible, but due to the crush of other pressing Commission business has not been able to frame its reply until now.

Given the importance of the subject of this case, and the press of time, Staff asks the Commission to permit the proposed reply.

Respectfully submitted,

DANA K. JOYCE General Counsel

Thomas R. Schwarz, Jr. Deputy General Counsel Missouri Bar No. 29645

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 23rd day of January, 2001.

Thomas R. Schwarz, Jr.

Service List for Case No. GO-2000-394 Revised: January 23, 2001 (SW)

Office of the Public Counsel P.O. Box 7800 Jefferson City, MO 65102 Michael C. Pendergast Laclede Gas Company 720 Olive Street, Room 1520 St. Louis, MO 63101