

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

AREA CODE 314
342-0532

MICHAEL C. PENDERGAST
ASSOCIATE GENERAL COUNSEL

October 22, 1998

FILED

OCT 22 1998

HAND DELIVERED

Missouri Public
Service Commission

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

RE: Case No. GO-99-155

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.

Please file-stamp the additional copy of such filing and return the same in the pre-addressed, stamped envelope provided.

Thank you for your consideration in this matter.

Sincerely,



Michael C. Pendergast

MCP:jaa

cc: All parties of record

Enclosure

OCT 22 1998

Missouri Public
Service Commission

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

2. On October 14, 1998, the Staff also filed a Motion in the above-referenced case requesting that the Commission open a docket for the purpose of examining Laclede's "copper service line replacement program and leak surveys and investigations..." In support of its Motion, the Staff

cited, among other things, its investigation into the aforementioned Pralle Lane and Bergerac Drive incidents.

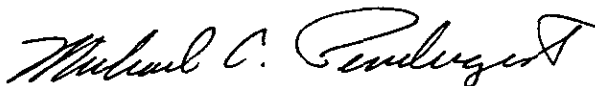
3. Laclede is committed to addressing the issues raised by Staff in its Motion in both a prompt and responsible manner. The Company therefore has no objection to opening the instant docket. Laclede believes, however, that any determination regarding the scope of this docket should be deferred until such time as: (1) Laclede has had an opportunity to respond to the recommendations made by the Staff in Case Nos. GS-98-422 and GS-98-423; and (2) Staff has had an opportunity to advise the Commission of its position regarding the adequacy of Laclede's response.

4. By following such an approach, Laclede is hopeful that the issues in this docket can be substantially narrowed. For example, at the time Laclede files its response, it intends to describe the various steps it has already taken, or is willing to take, to address the concerns raised by Staff in connection with the Company's leak survey, training and investigation procedures. To the extent the Staff and the Commission concur in Laclede's proposals, the submission of these responses should substantially reduce, if not completely eliminate, any related issue that may need to be addressed in this docket. At a minimum, however, the submission of these proposals will enhance the ability of both the Staff and the Commission to identify what specific issues need to be addressed in this proceeding and to ensure

that such issues can be addressed in an orderly and expeditious manner.

WHEREFORE, for the foregoing reasons, Laclede Gas Company respectfully requests that the Commission issue its Order: (1) establishing this docket; and (2) directing the parties to submit their recommendations (either jointly or individually) regarding the issues to be addressed herein within thirty days of the date Laclede files its respective responses in Case Nos. GS-98-422 and GS-98-423.

Respectfully submitted,

A handwritten signature in cursive script, reading "Michael C. Pendergast".

Michael C. Pendergast #31763
Associate General Counsel
Laclede Gas Company
720 Olive Street, Room 1520
St. Louis, MO 63101
(314) 342-0532

CERTIFICATE OF SERVICE

Michael C. Pendergast, Associate General Counsel for Laclede Gas Company, hereby certifies that the foregoing Response to Staff's Motion to Open Docket in this case has been duly served upon all parties of record to this proceeding by placing a copy thereof in the United States mail, postage prepaid, on this 22nd day of October, 1998.

Michael C. Pendergast