

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

Myron Lockhart,)	
)	
Complainant,)	
v.)	Case No. GC-2012-0078
)	
Laclede Gas Company and Union Electric,)	
)	
Respondents.)	

**LACLEDE GAS COMPANY’S RESPONSE TO STAFF REPORT
AND RENEWED MOTION TO DISMISS COMPLAINT**

COMES NOW Laclede Gas Company (“Laclede” or “Company”) and files this response to the Staff’s Report and renews its motion to dismiss Mr. Lockhart’s complaint. In support thereof, Laclede states as follows:

1. Pursuant to the Commission’s October 25, 2011 order, Staff filed an updated report on November 22, 2011. Staff concluded in the report that Complainant has made no allegations over which the Commission has jurisdiction and requested no relief the Commission has authority to grant. Staff therefore recommended that the Complaint be dismissed.

2. Laclede concurs with both the Staff’s November 22 report and the response filed by Ameren Missouri on December 6, 2011. For the reasons stated therein, and in Laclede’s October 13 pleading, Laclede renews its motion that the Complaint be dismissed as having failed to state a claim upon which relief can be granted.

3. A number of pleadings were filed in this case without gaining an understanding of the true nature of Complainant’s issue. Laclede appreciates Staff’s efforts in clarifying the issue for the parties. For Complainant’s benefit, Laclede has

checked its records, but does not maintain information on transfers of ownership of its securities from the 1970s.

WHEREFORE, Laclede respectfully requests that the Commission accept this response and grant Staff's recommendation and the Respondents' motions to dismiss the Complaint.

Respectfully submitted,

/s/ Rick Zucker

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Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing Motion was served on the Complainant, the General Counsel of the Staff of the Missouri Public Service Commission, and the Office of Public Counsel on this 7th day of December, 2011 by United States mail, hand-delivery, email, or facsimile.

/s/ Gerry Lynch