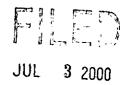
## BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI



In the matter of the Application of LACLEDE GAS	)	Service Commission
COMPANY for an order authorizing LACLEDE GAS	)	00/
COMPANY, to issue and sell First Mortgage Bonds,	)	
Unsecured Debt and authorized but unissued Common	)	
Stock of the Company in a total amount not to exceed	)	Case No. GF-2000-843
\$350,000 000 together with certain rights to accompany	)	
the Common Stock and any additional shares of Common	)	
Stock as may be required by the exercise of such rights; all	)	
pursuant to a Universal Shelf Registration Statement.	)	

## **MOTION FOR EXPEDITED TREATMENT**

COMES NOW Laclede Gas Company ("Laclede" and "Company"), pursuant to 4 CSR 240-2.080(17), and submits its Motion for Expedited Treatment in the above-captioned case. In support thereof, Laclede states as follows.

- 1. On June 23, 2000, Laclede Gas Company filed its Verified Application ("Application") requesting that the Commission grant it the authority to issue and sell various debt and equity instruments pursuant to a universal shelf registration statement. In its Application, Laclede requested that the Commission issue an order granting such authority by August 23, 2000.
- 2. On June 26, 2000, the Commission issued a Notice of Deficiency and Order Directing Compliance (hereinafter "Notice and Order"). In its Notice, the Commission stated that Laclede's Application failed to comply with the requirements of 4 CSR 240-2.080(17) in that the Company had sought expedited treatment for its Application without filing the requisite motion for such treatment mandated by that rule. The Commission directed Laclede to correct this deficiency no later than July 3, 2000.

- 3. Because there is a time-sensitive element to the relief requested in the Application, Laclede believed it was appropriate to advise the Commission that there was a specific date by which the Company would prefer the Commission take action on its Application. Laclede was unsure, however, whether a motion for expedited treatment was necessary since the time period proposed by Laclede for processing the Application equals or exceeds the time period that has typically been required by the Commission to process other financing applications filed by the Company. Nevertheless, Laclede appreciates the opportunity to explain why it believes its request should be granted.
- 4. As noted in its Application, the Company requests that the Commission act on its Application by August 23, 2000. Laclede submits that granting the relief requested in the Application by that date will have no negative impact on the Company's customers or the general public. To the contrary, granting such relief by the requested date will give the Company greater opportunities to take advantage of any favorable financing opportunities that may arise as a result of changing conditions in the financial markets; a circumstance that can only benefit the Company's customers. Even more significantly, the ability to issue additional debt and/or equity will ensure that the Company has the financial resources required to satisfy, on as reasonable terms as possible, the capital demands imposed by the need to purchase and store the gas supplies required to meet its customers' requirements; the costs of which have escalated dramatically this year due to unprecedented increases in the market price of such supplies.
- 5. Laclede's Application was filed as soon as possible (i.e., on the next day) after the Company received approval from its Board of Directors to proceed with its request for financing

<sup>&</sup>lt;sup>1</sup>Since 1993, the Commission has required anywhere from 30 to 60 days to process Lacelede's financing applications. *See* Case No. GF-93-272 (Application filed 3/31/93; Order Issued 4/30/93); Case No. GF-97-302 (Application filed 2/3/97; Order issued 3/19/97); GF-99-239 (Application filed 1/25/98; Order issued 1/12/99); GF-99-332 (Application filed 2/8/99; Order issued 4/8/99).

authorization. In seeking such approval from its Board at the time it did and in expeditiously filing its Application on the next day, Laclede was mindful of the time and resource constraints confronting the Commission and its Staff. Again, that is why Laclede made every effort to file its Application on a schedule that would provide a processing period for the Application equal to, or greater than, that typically required by the Commission and its Staff to process other financing applications by Laclede. At the same time, however, the timing of Laclede's filing was also driven by the need to base its financing request on an assessment of its changing capital requirements that was as current as possible, especially in light of how those capital requirements were being affected by changes in the market price for natural gas. Laclede does not believe that an earlier filing would have permitted a fully adequate assessment of such requirements. For all of these reasons, Laclede requests that the Commission grant its Motion for Expedited Treatment.

WHEREFORE, for the foregoing reasons, Laclede Gas Company respectfully requests that the Commission grant its Motion for Expedited Treatment.

Respectfully submitted,

Michael C. Pendergast #30763

Legal. A. Conley

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## **CERTIFICATE OF SERVICE**

Michael C. Pendergast, Assistant Vice President and Associate General Counsel for Laclede Gas Company, hereby certifies that the foregoing Motion for Expedited Treatment has been duly served upon the General Counsel of the Missouri Public Service Commission and the Office of the Public Counsel by placing a copy thereof in the United States mail, postage prepaid or by hand delivery, on this 3rd day of July, 2000.

Michael C. Pendergast