

Commissioners

SHEILA LUMPE Chair

HAROLD CRUMPTON

CONNIE MURRAY

ROBERT G. SCHEMENAUER

M. DIANNE DRAINER Vice Chair

Missouri Public Service Commission

POST OFFICE BOX 360 JEFFERSON CITY, MISSOURI 65102 573-751-3234

573-751-1847 (Fax Number) http://www.ecodev.state.mo.us/psc/

July 19, 1999

GORDON L. PERSINGER Acting Executive Director Director, Research and Public Affairs

> WESS A. HENDERSON Director, Utility Operations

ROBERT SCHALLENBERG Director, Utility Services

DONNA M. KOLILIS Director, Administration

DALE HARDY ROBERTS Secretary/Chief Regulatory Law Judge

> DANA K. JOYCE General Counsel

FILED

JUL 1 9 1999

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

Missouri Public Service Commission

RE: Case No. GR-99-315 - Laclede Gas Company

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and fourteen (14) conformed copies of Staff's Proposed List of Issues and Motion to File an Order of Witnesses and Order of Cross-examination at a Later Date and to Allow an Additional Seven Days to Amend the General List of Issues.

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

Thank you for your attention to this matter.

Sincerely your

Cliff D. Shodgrass

Senior Counsel (573) 751-3966

(573) 751-9285 (Fax)

CES/wf Enclosure BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

JUL 1 9 1999

Missouri Public Service Commission

In the Matter of Laclede Gas Company's)	Case No. GR-99-315
Tariff to Revise Natural Gas Rate Schedules)	

STAFF'S PROPOSED GENERAL LIST OF ISSUES AND REQUEST FOR AN EXTENSION OF TIME TO FILE AN ORDER OF WITNESSES AND AN ORDER OF CROSS-EXAMINATION AND TO ALLOW AN ADDITIONAL SEVEN DAYS TO AMEND THE GENERAL LIST OF ISSUES

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), on behalf of all parties to this case submits the following Proposed List of General Issues for the evidentiary hearing to be held in this case on August 30th through September 3rd, 1999.

In addition, the Staff respectfully requests that the Commission enter an Order allowing the parties additional time to file an order of witnesses and an order of cross-examination. In support of this request, the Staff states that the parties are still engaged in settlement negotiations that may resolve several of the issues. Therefore, additional time is necessary to determine what issues are actually in controversy and what witnesses will be necessary to develop those issues before the Commission. Further, due to settlement efforts which are still ongoing, 1999, the Staff and Laclede Gas Company ("Laclede") have not had sufficient time to accurately articulate the specifics of the subissues that may exist in this case. Therefore, for all the above reasons, the Staff respectfully requests that the Commission allow the parties until August 23, 1999, to file an order of witnesses and an order of cross-examination. (August 23, 1999, is also the date the

·

parties are required to submit Statements of Position, and by that date the order of witnesses, the order of cross-examination, and sub-issues can be clearly specified prior to hearing.)

GENERAL LIST OF ISSUES

 \mathbf{Y}^{i}

Staff, Union Electric, Laclede, Public Counsel and the Missouri Energy Group provided a list of issues and these issues have been placed in five general categories. Subissues have not been identified.

Rate Base Issues

Accounting Authority Orders/Trackers

Cash Working Capital

Income Statement Issues

Accounting Authority Orders/Trackers

Depreciation

Weather

Advertising

Appliance Repair/HVAC

Y2K Costs

Capacity Release/Off-System Sales Revenue

Rate of Return Issues

Return on Equity

Capital Structure

Rate Design Issues

€.

Class Cost of Service

Gas (Supply) Cost Removal From Base Rates

Capacity Charge

MEIC Issue On Daily Balancing

Seasonal Air Conditioning/Structure

Tariff Issues

Tariff Language for Off-System Sales

Insulation Financing Program

Pursuant to the aforegoing the Staff respectfully submits its Proposed General List of Issues and Staff also requests that the Commission allow the parties until August 23, 1999, to submit an order of witnesses and an order of cross-examination. In addition, the parties provided Staff with some last minute changes to the list of issues and all parties could not be consulted in time to meet the filing deadline time. Therefore the Staff also requests that should any party feel that this List of Issues does not adequately reflect its position, an additional seven (7) days should be alloted to complete this list.

Respectfully submitted,

DANA K. JOYCE General/Counsel

Cliff E/Snodgrass

Senior Counsel

Illinois Bar No. 3123645

Attorneys for the

Missouri Public Service Commission

P.O. Box 360

Jefferson City, Mo. 65102

(573) 751-3966 (573)751-9285 (Fax)

SERVICE LIST FOR CASE NO: GR-99-315 July 6, 1999

"

Office of the Public Counsel P.O. Box 7800 Jefferson City, MO 65102

Ronald K. Evan/Susan B. Knowles Union Electric Company d/b/a AmerenUE 1901 Chouteau Avenue P.O. Box 66149 (MC 1310) St. Louis, MO 63166-6149

John D. Landwehr Cook, Vetter, Doerhoff & Landwehr 231 Madison Jefferson City, MO 65102

Robert C. Johnson 720 Olive Street, 24th Floor St. Louis, MO 63101 Michael C. Pendergast Laclede Gas Company 720 Olive Street St. Louis, MO 63101

Diana M. Schmidt Bryan Cave LLP 211 N. Broadway St. Louis, MO 63102-2750

Richard Perkins
Diekemper, Hammond, Shinners, Turcotte
7730 Carondelet, Suite 200
St. Louis, MO 63105