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March 8, 1999

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

FILED
MAR 8 1999
Missouri Public
Service Commission

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

Dear Mr. Roberts:

Enclosed for filing please find the original and fourteen copies of **Public Counsel's Response to Staff's Motion to Establish Procedural Schedule**. I have on this date mailed or hand-delivered copies to all counsel of record. Please "file" stamp the extra-enclosed copy and return it to this office.

Thank you for your attention to this matter.

Sincerely,

Douglas E. Micheel
Senior Public Counsel

DEM/mk

Enclosures

cc: Counsel of Record

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

FILED
MAR 8 1999
Missouri Public
Service Commission

In the Matter of Laclede Gas Company's)
Tariff Sheets to Revise Natural Gas Rates)
Schedules.)

Case No. GR-99-315

Public Counsel's Response to Staff's Motion to Establish Procedural Schedule

Comes now, the Office of the Public Counsel ("Public Counsel") and for its Response to Staff's Motion to Establish Procedural Schedule states as follows:

1. On or about, March 4, 1999 the Staff filed it proposed procedural schedule in the above referenced matter.
2. Public Counsel does not oppose Staff's proposed schedule. However, Public Counsel would note that Staff's proposed schedule does not include a separate filing date for the direct testimony of Staff, Public Counsel and Intervenors regarding rate design. Traditionally, two separate dates have been set for the filing of Staff, Public Counsel, Intervenors, revenue requirement direct testimony and Staff, Public Counsel and Intervenors testimony with respect to rate design. For example, see the procedural schedules in Missouri Gas Energy's last two rate case filings GR-96-285 and GR-98-140; the current schedule St. Joseph Light & Power GR-99-246 and the schedule in Laclede's last rate case GR-98-374. If the Commission is inclined to accept the Staff's proposed procedural schedule, Public Counsel recommends that the Staff, Public Counsel and Intervenors be ordered to file their direct testimony with respect to revenue requirement issues on July 6, 1999 and that the Staff, Public Counsel and Intervenors be required to file their direct testimony with respect to rate design on July 13, 1999.

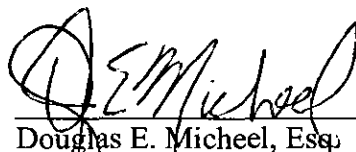
3. Public Counsel has discussed this proposal with the attorney for the Staff. The Staff indicated that they support such a bifurcated filing and indicated that failure to include such bifurcated filing was merely an oversight by Staff.

4. Public Counsel also would note that Staff's proposed schedule includes a prehearing conference for the dates July 16 -19, 1999. Public Counsel would point out that July 17 and 18 are a Saturday and Sunday. Public Counsel recommends if the Commission decides to accept Staff's proposed procedural schedule that the prehearing conference be set for July 19 through July 23, 1999.

5. Public Counsel concurs with paragraph five of Staff's Motion to Establish Procedural Schedule.

WHEREFORE, the Public Counsel requests that if the Commission decides to establish the procedural schedule set out in paragraph 7 of Staff's Motion, that modifications in the schedule be made with respect to the filing of the direct testimony of Staff, Public Counsel and Intervenors with respect to rate design and that the prehearing conference be rescheduled for July 19 through July 23.

Respectfully submitted,
OFFICE OF THE PUBLIC COUNSEL



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CERTIFICATE OF SERVICE

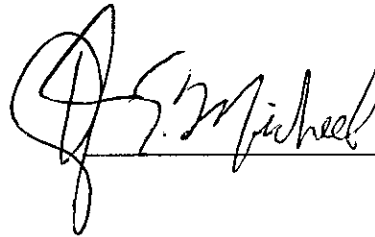
I hereby certify that a true and correct copy of the foregoing has been mailed or hand-delivered to the following on this 8th day of March, 1999:

Michael C. Pendergast
Laclede Gas Company
720 Olive St.
St. Louis, MO 63101

Marc Poston
Missouri Public Service Commission
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Jefferson City, MO 65102

Ronald K. Evans
Union Electric
P.O. Box 66149
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Bryan Cave LLP
211 N. Broadway
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A handwritten signature in cursive script, appearing to read "J. S. Michael", is written over a horizontal line.