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October 14, 1998

FILED

OCT 14 1998

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: In the matter of the adequacy of Laclede Gas Company's service line replacement program and leak survey procedures *GO-99-155*

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and fourteen (14) conformed copies of a **MOTION TO OPEN DOCKET**.

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

Thank you for your attention to this matter.

Sincerely yours,

Lera L. Shemwell
Assistant General Counsel
(573) 751-7431
(573) 751-9285 (Fax)

Enclosure
cc: Counsel of Record

FILED

OCT 14 1998

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Public
Service Commission

In the matter of the adequacy of Laclede)
Gas Company's service line replacement)
program and leak survey procedures)

Case No. 60-99-155

MOTION TO OPEN DOCKET

COMES NOW the Staff of the Missouri Public Service Commission ("the Staff") and for its Motion to Open Docket states as follows:

1. The Missouri Public Service Commission ("Commission") has authority to establish a docket for the purpose of receiving information from public utilities under its jurisdiction pursuant to Section 393.140 RSMo 1994. Laclede Gas Company ("Laclede") is a gas corporation as defined in Section 386.020(18) Supp. 1996, and, as such, is a public utility subject to the Commission's jurisdiction pursuant to Section 386.020(42) RSMo Supp. 1996. Laclede is also subject to the Commission's safety jurisdiction under Section 386.310 RSMo Supp. 1996.

2. Laclede provides natural gas service in St. Louis, St. Charles, Franklin, Jefferson, St. Francois, St. Genevieve, Iron, Madison, and Butler counties in Missouri.

3. Two gas incidents involving Laclede gas service occurred in March 1998. An explosion and ensuing fire occurred at 401 Pralle Lane, St. Charles, Missouri, on Tuesday, March 17, 1998, involving natural gas. Another explosion and ensuing fire occurred at 732 Bergerac Drive in Creve Coeur, Missouri, on Friday, March 13, 1998, also involving natural gas.

4. On April 14, 1998, the Commission opened cases GS-98-422 and GS-98-423 to receive information related respectively to the 401 Pralle Lane and 732 Bergerac Drive natural gas incidents.

5. Staff filed Incident Investigation Reports in each of these dockets on October 13, 1998.

6. On October 13, 1998, Staff filed a Complaint with the Commission concerning the 401 Pralle Lane incident. The complaint alleges that Laclede failed to perform the required six and one-half (6½) month leak recheck investigation as required by 4 CSR 240-40.030(14)(C)3.

6. Both incidents involved natural gas leaking from corroded sections of copper service lines. The copper service lines at both locations were owned and operated by Laclede.

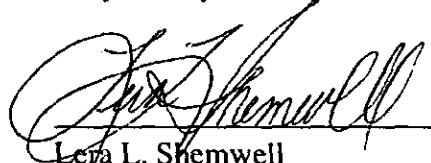
7. Between 1985 and 1990, the Staff filed three natural gas incident reports involving Laclede. All of these incidents involved corrosion on copper service lines owned and operated by Laclede.

8. Pursuant to a 1991 settlement agreement approved by the Commission, Laclede was to institute a formal replacement program, that, in part, would identify and replace direct-buried copper service lines in areas of known active corrosive environments.

9. As a result of the Staff's investigations into the Pralle Lane and Bergerac Drive incidents, Staff believes a more thorough and complete examination and analysis of Laclede's copper service line replacement program and leak surveys and investigations is required. The issues raised by the investigation warrant the attention of the Commission, and Staff recommends that a case be opened for that purpose.

WHEREFORE, the Staff respectfully requests that the Commission open a docket for the purpose of receiving information concerning the adequacy of Laclede's entire copper service line program and the effectiveness of all of the Company's leak surveys and investigations.

Respectfully submitted,

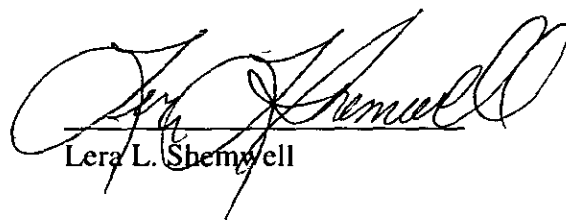


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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered to Michael C. Pendergast, Attorney at Law, Laclede Gas Co., 720 Olive Street, Rm. 824, St. Louis, MO 63101, and the Office of the Public Counsel, P.O. Box 7800 Jefferson City, MO 65102, on this fourteenth day of October 1998.



Lera L. Shemwell