

**LACLEDE GAS COMPANY  
720 OLIVE STREET  
ST. LOUIS, MISSOURI 63101  
(314) 342-0601**

KENNETH J. NEISES  
EXECUTIVE VICE PRESIDENT  
Energy & Administrative Services

October 29, 2004

**VIA EFIS**

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
Governor Office Building  
200 Madison Street  
Jefferson City, MO 65101

Dear Mr. Roberts:

Enclosed herewith for filing with the Missouri Public Service Commission is a revised tariff sheet, P.S.C. MO. No. 5 Consolidated, Two Hundred and Second Revised Sheet No. 29, which is applicable to both divisions of Laclede Gas Company ("Company"). This revised tariff sheet, which has an issue date of October 29, 2004, and an effective date of November 15, 2004, reflects the scheduled November Purchased Gas Adjustment ("PGA") of the Company as provided by Sheet Nos. 15 through 28-g of the Company's tariff. Such revised PGA rates, which will be made effective on a pro-rata basis, include changes for both the Current Purchased Gas Adjustment ("CPGA") and the Actual Cost Adjustment ("ACA") factors for natural gas and subdivision propane customers.

As a result of this filing, the Company's underlying charge for gas for firm sales customers will increase from \$.71623 per therm to \$.82923 per therm primarily due to the sharp increase in wholesale natural gas prices that has occurred since the Company established the PGA factors that became effective in June 2004. However, the Company's use of natural gas financial hedging instruments and withdrawals of gas from underground storage facilities has substantially reduced the impact of these higher prices on the rates paid by the Company's customers.

The natural gas PGA rates provided herein will increase the average monthly natural gas bill of the typical residential heating customer by approximately \$15, assuming normal weather, for the two months of November and December during which the new rates will be in effect. Such rates will remain in effect until the Company's next scheduled PGA change becomes effective during January 2005, at which time the Company's rates may be adjusted downward or upward depending on market conditions at that time.

Included with this filing, in addition to Laclede's Revised Sheet No. 29, are schedules that set forth the derivation of the new ACA factors for each customer classification.

Sincerely,

A handwritten signature in black ink, appearing to read "K. J. Neises", written in a cursive style.

Kenneth J. Neises  
Executive Vice President  
Energy & Administrative Services

KJN

Enclosures

cc: Office of the Public Counsel

**P.S.C. MO. No. 5 Consolidated, Two Hundred and Second Revised Sheet No. 29  
CANCELLING P.S.C. MO. No. 5 Consolidated, Two Hundred and First Revised Sheet No. 29**

Laclede Gas Company  
Name of Issuing Corporation or Municipality

For

Refer to Sheet No. 1  
Community, Town or City

**SCHEDULE OF RATES**

**PURCHASED GAS ADJUSTMENT CLAUSE**

**Adjustment Statement**

In accordance with the Company's Purchased Gas Adjustment Clause contained in Sheet Nos. 15 through 28-g, inclusive and the Company's Purchased L.P. Gas Adjustment Clause contained on Sheet No. 8, the following adjustments per therm or per gallon, where applicable, will become effective on and after the effective date of this tariff.

<u>Sales Classification</u>	<u>Current PGA</u>	<u>ACA</u>	<u>UACA</u>	<u>Refund</u>	<u>Total Adjustment</u>
<b>Residential:</b>					
Block 1	61.231¢	2.314¢	(0.000¢)	(0.000¢)	63.545¢
Block 2	96.299¢	2.314¢	(0.000¢)	(0.000¢)	98.613¢
<b>Commercial &amp; Industrial</b>					
Class I - Block 1	55.598¢	2.314¢	(0.000¢)	(0.000¢)	57.912¢
Class I - Block 2	94.873¢	2.314¢	(0.000¢)	(0.000¢)	97.187¢
Class II - Block 1	66.163¢	2.314¢	(0.000¢)	(0.000¢)	68.477¢
Class II - Block 2	94.873¢	2.314¢	(0.000¢)	(0.000¢)	97.187¢
Class III - Block 1	67.016¢	2.314¢	(0.000¢)	(0.000¢)	69.330¢
Class III - Block 2	94.873¢	2.314¢	(0.000¢)	(0.000¢)	97.187¢
LVTSS	*	14.753¢	0.000¢	(0.000¢)	*
VF	*	5.000¢	0.000¢	(0.000¢)	*
<b>Other &amp; Unblocked Firm</b>	80.609¢	2.314¢	(0.000¢)	(0.000¢)	82.923¢
<b>Seasonal &amp; Interruptible</b>	70.811¢	(0.070¢)	0.000¢	(0.000¢)	70.741¢
<b>L.P. Gas</b>	106.022¢	2.792¢	--	--	108.814¢

Residential sales are rendered under Residential General Service (Sheet No. 2)

Commercial & Industrial sales are rendered under Commercial & Industrial General Service (Sheet Nos. 3, 3-a and 3-b)

LVTSS sales are rendered under the Large Volume Transportation and Sales Service Rate (Sheet No. 34).

VF sales are rendered under the Vehicular Fuel Rate (Sheet No. 11).

Other Firm sales are rendered under the Large Volume Service Rate (Sheet No. 5) and the Unmetered Gas Light Service Rate (Sheet No. 9).

Seasonal and Interruptible sales are rendered under the Residential Seasonal Air Conditioning Service Rate (Sheet No. 4), the Commercial & Industrial Seasonal Service Rate (Sheet No. 4-a) and the Interruptible Service Rate (Sheet No. 7).

L.P. Gas sales are rendered under the General L.P. Gas Service Rate (Sheet No. 8).

\* Revised each month in accordance with Section A.5 of the PGA clause.

**Additional Transportation Charges, ACA Factors and Refunds**

<u>Customer Groups</u>	<u>TOP</u>	<u>Capacity Reservation</u>	<u>Other Non-Commodity</u>	<u>ACA</u>	<u>Refund</u>
Firm	-	5.632¢	-	0.802¢	0.000¢
Basic - Firm Sales	-	-	-	0.000¢	0.000¢
Prior to 11/15/89	-	-	-	0.000¢	0.000¢
Basic - Other	-	-	-	0.000¢	(0.000¢)

DATE OF ISSUE      October 29, 2004  
Month      Day      Year

DATE EFFECTIVE      November 15, 2004  
Month      Day      Year

ISSUED BY      K.J. Neises,      Executive Vice President,      720 Olive St.,      St. Louis, MO 63101  
Name of Officer      Title      Address

DERIVATION OF ACTUAL COST ADJUSTMENT  
EFFECTIVE NOVEMBER 15, 2004  
FIRM SALES OTHER THAN LVTSS &VF

<b>Deferred Gas Cost Account-</b>	
Starting Balance	(\$7,170,429)
Deferrals:	
PGA Tracking Differences	\$1,189,925
Prior ACA Period Bill Adjustments	
Fiscal 2003	(\$10,724)
	\$0
Propane Peak Shaving	(\$1,317,629)
Gas Expense Adjustment	\$20,130,614
	\$0
	\$0
Carrying Costs	
Fiscal 2004	(\$83)
Adjustment to prior years	\$0
Price Stabilization Balance	(\$9,718)
	\$0
Total	\$19,982,385
ACA Recovery - Nov. 15, 2003 through Nov.14, 2004	\$5,728,604
UFA Recovery	\$0
Deferred Gas Cost Account Ending Balance	\$18,540,560
<b>Incentive Adjustment Account-</b>	
Starting Balance	\$3,347,028
	\$0
	\$0
	\$0
Gas Procurement (Company retention)	\$0
Total	\$0
Incentive Adjustment Account Recovery	(\$3,226,084)
Incentive Adjustment Account-Ending Balance	\$120,944
<b>Total ACA Balance</b>	<b>\$18,661,504</b>
Estimated Annual Firm Sales (therms)	806,594,000
Actual Cost Adjustment (Per Therm)	\$0.02314

DERIVATION OF ACTUAL COST ADJUSTMENT  
EFFECTIVE NOVEMBER 15, 2004  
LVTSS

<b>Deferred Gas Cost Account-</b>	
Starting Balance	\$1,072,028
Deferrals:	
PGA Tracking Differences	(\$9,768)
Prior ACA Period Bill Adjustments	
Fiscal 2003	(\$61)
	\$0
Propane Peak Shaving	(\$2,554)
Gas Expense Adjustment	\$102,841
	\$0
	\$0
	\$0
	\$0
	\$0
Total	\$90,458
ACA Recovery - Nov. 15, 2003 through Nov. 14, 2004	(\$181,909)
Deferred Gas Cost Account Balance	\$980,577
<b>Incentive Adjustment Account-</b>	
Starting Balance	\$63,158
	\$0
	\$0
Gas Procurement (Company retention)	\$0
Total	\$0
Incentive Adjustment Account Recovery	(\$11,014)
Incentive Adjustment Account-Ending Balance	\$52,144
<b>Total ACA Balance</b>	<b>\$1,032,721</b>
Estimated Annual LVTSS Sales (therms)	7,000,000
Actual Cost Adjustment (Per Therm)	\$0.14753

DERIVATION OF ACTUAL COST ADJUSTMENT  
EFFECTIVE NOVEMBER 15, 2004  
VF

<b>Deferred Gas Cost Account-</b>	
Starting Balance	(\$11,122)
Deferrals:	
PGA Tracking Differences	(\$1,596)
Prior ACA Period Bill Adjustments	
Fiscal 2003	(\$10)
	\$0
Propane Peak Shaving	(\$417)
Gas Expense Adjustment	\$16,808
	\$0
	\$0
	\$0
	\$0
	\$0
Total	\$14,785
ACA Recovery - Nov. 15, 2003 through Nov.14, 2004	\$15,435
Deferred Gas Cost Account Balance	\$19,098
<b>Incentive Adjustment Account-</b>	
Starting Balance	\$893
	\$0
	\$0
Gas Procurement (Company retention)	\$0
Total	\$0
Incentive Adjustment Account Recovery	(\$1,241)
Incentive Adjustment Account-Ending Balance	(\$348)
<b>Total ACA Balance</b>	<b>\$18,750</b>
Estimated Annual VF Sales (therms)	260,000
Actual Cost Adjustment (Per Therm)	\$0.05000 *

\* Maximum ACA rate per Sheet No. 22 of the Company's tariff.

DERIVATION OF ACTUAL COST ADJUSTMENT  
EFFECTIVE NOVEMBER 15, 2004  
INTERRUPTIBLE SALES

<b>Deferred Gas Cost Account-</b>	
Starting Balance	\$36,539
Deferrals:	
PGA Tracking Differences	(\$65,235)
Prior ACA Period Bill Adjustments	
Fiscal 2003	(\$134)
Gas Expense Adjustment	\$48,122
Carrying Costs	
Fiscal 2004	(\$1)
Adjustment to prior years	\$0
Price Stabilization Balance	(\$73)
	\$0
Total	(\$17,321)
ACA Recovery - Nov. 15, 2003 through Nov.14, 2004	(\$44,515)
UFA Recovery	\$0
Deferred Gas Cost Account Balance	(\$25,297)
<b>Incentive Adjustment Account-</b>	
Starting Balance	\$26,090
	\$0
Gas Procurement (Company retention)	\$0
Total	\$0
Incentive Adjustment Account Recovery	(\$4,396)
Incentive Adjustment Account-Ending Balance	\$21,694
<b>Total ACA Balance</b>	<b>(\$3,603)</b>
Estimated Annual Interruptible Sales (therms)	5,183,000
Actual Cost Adjustment (Per Therm)	(\$0.00070)

DERIVATION OF ACTUAL COST ADJUSTMENT  
EFFECTIVE NOVEMBER 15, 2004  
L.P. SALES

	Total
<b>Deferred Gas Cost Account-</b>	
Starting Balance	\$27,119
Deferrals	\$6,268
ACA Recovery - Nov. 15, 2003 through Nov.14, 2004	(\$30,093)
Deferred Gas Cost Account Balance	\$3,294
Estimated Annual L.P. Sales (gallons)	118,000
Actual Cost Adjustment (Per Gallon)	\$0.02792



DERIVATION OF ACTUAL COST ADJUSTMENT  
EFFECTIVE NOVEMBER 15, 2004  
FIRM TRANSPORTATION

<b>Deferred Gas Cost Account-</b>	
Starting Balance	(\$83,963)
Deferrals:	
PGA Tracking Differences	(\$34,076)
Prior ACA Period Bill Adjustments	
Fiscal 2003	(\$100)
Gas Expense Adjustment	\$465,428
	\$0
	\$0
Total	<u>\$431,252</u>
ACA Recovery - Nov. 15, 2003 through Nov. 14, 2004	\$119,033
Deferred Gas Cost Account Balance	\$466,322
<b>Incentive Adjustment Account-</b>	
Starting Balance	(\$20,549)
	\$0
	\$0
Gas Procurement (Company retention)	
Total	\$0
Incentive Adjustment Account Recovery	\$18,557
Incentive Adjustment Account-Ending Balance	(\$1,992)
<b>Total ACA Balance</b>	<b>\$464,330</b>
Estimated Annual Firm Transportation (therms)	57,879,000
Actual Cost Adjustment (Per Therm)	\$0.00802