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December 4, 1998

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WESS A. HENDERSON
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ROBERT SCHALLENBERG
Director, Utility Services

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Director, Administration

DALE HARDY ROBERTS
Secretary/Chief Regulatory Law Judge

DANA K. JOYCE
General Counsel

FILED

DEC 4 1998

Missouri Public
Service Commission

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

RE: GO-99-155 - In the Matter of the Adequacy of Laclede Gas Company's Service Line Replacement Program and Leak Survey Procedures

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and fourteen (14) conformed copies of a **MOTION FOR MODIFICATION OF ORDER ESTABLISHING CASE.**

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

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BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

DEC 4 1998

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. GO-99-155

MOTION FOR MODIFICATION OF ORDER ESTABLISHING CASE

COMES NOW the Staff of the Missouri Public Service Commission and respectfully requests the Commission modify the Order Establishing Case as set out below. In support of that request, the Staff states:

1. The October 30, 1998 order in this case requires that Staff file a report with the Commission within 120 days of the date of the order, or a March 1, 1999 filing date. This portion of the order seems to be based on the requirements associated with a Gas Incident investigation docket. Unlike an incident investigation that deals with a single event, and has established procedures, this docket was opened to investigate Laclede Gas Company's ("Laclede") copper service line replacement program and their leak survey and investigation procedures.

2. The scope of this docket is not determined by a single specific incident and because of the potentially broader scope of the investigation, Staff cannot yet specifically determine when their investigation will be completed. However, Staff estimates that this docket will require longer than the normal incident investigation and therefore requests that the requirement of 120 days for filing a report be removed.

3. The requested elimination of a firm due date will allow for a thorough investigation necessary to achieve the goal of this docket, which is to determine the adequacy of Laclede's existing copper-service-line replacement program and effectiveness of Laclede's investigation and leak survey procedures.

4. In addition, the order requires Staff to file a report on the investigation with the Commission. Unlike a standard Gas Incident investigation, in which a definable incident is the subject of the investigation and a report to the Commission is standard procedure, this investigation is not a standard incident investigation.

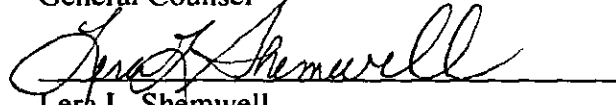
5. In lieu of the requirement for a report, Staff recommends that Staff provide an update to the Commission no later than April 30, 1999, as to the progress of its investigation and recommend further actions and a schedule to resolve this docket.

6. The "Energy Department" was referenced in the October 30, 1998 order. There is no longer an "Energy Department," as such, at the Commission. Reference to the "Gas Department" would be the appropriate designation in this case.

WHEREFORE Staff requests the Commission clarify its order to reflect that this investigation is not a standard incident investigation and remove the investigation deadline, modify the method of reporting to the Commission, and change the reference to the "Energy Department" to reflect the current designation of "Gas Department."

Respectfully submitted,

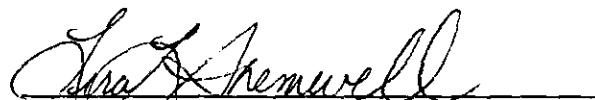
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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, first-class mail, postage pre-paid, sent by facsimile, or hand-delivered to all counsel of record as shown on the attached service list this 4th day of December, 1998.


Lera L. Shemwell

Service List for
Case No. GO-99-155
Revised: December 4, 1998

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