

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Laclede Gas Company)
Concerning a Natural Gas Incident at)
Premio Lane in Fenton, Missouri) Case No. Case No. GS-2007-_____

STAFF'S REQUEST TO ESTABLISH A
CASE FOR INVESTIGATION OF GAS SAFETY INCIDENT

COMES NOW the Staff of the Missouri Public Service Commission and for its Motion to Open Case states:

1. The Missouri Public Service Commission has statutory responsibility to assure the health and safety of employees, customers and the public service by natural gas corporations under Section 386.310 RSMo 2000.
2. This section grants the Commission, after hearing or complaint, to issue orders to require a utility to take steps to promote the safety of utility employees, customers and the general public. Section 386.310 RSMo 2000.
3. Laclede Gas Company of St. Louis, Missouri (Laclede or Company) is a gas corporation as defined in Section 386.020(18) and is subject to the jurisdiction of this Commission.
4. A reportable incident occurred on September 12, 2006, in Fenton, Missouri, an area served by Laclede. There were no injuries or fatalities, but the home at 1390 Premio Lane in Fenton was destroyed by a natural gas explosion. Two neighboring homes were also damaged.

5. Staff's initial investigation indicates that a contractor for AmerenUE, also a regulated utility company, damaged a natural gas pipeline while installing an underground electric line.

6. As a result of the extent of the damage, Staff recommends the Commission open a case for the purpose of receiving the Gas Incident Report resulting from the incident investigation of the Commission's Gas Safety Department.

7. Within 120 days of the Commission opening a case, Staff will either file its final report or will file an update with the Commission detailing its progress in its investigation.

WHEREFORE the Staff recommends that the Commission open a case for investigation of the natural gas incident that occurred in Fenton, Missouri.

Respectfully submitted,

/s/ Lera L. Shemwell
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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 26th day of September 2006.

/s/ Lera L. Shemwell

Lera L. Shemwell