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

The Staff of the Missouri Public Service Commission,

Complainant,

vs.

Case No. GC-2011-0098

Laclede Gas Company,

Respondent.

## **STAFF'S RESPONSE REGARDING ISSUE NO. 1**

**COMES NOW** the Staff of the Missouri Public Service Commission ("Staff"), by and through counsel, and for its Response to Laclede's Motion Regarding Issue No. 1, states as follows:

1. As Laclede points out, this is Staff's Complaint. Therefore, Staff's version of the issues is to be preferred.

2. Additionally, unlike most Commission proceedings, this Complaint case has traditional issue-framing pleadings. A list of issues is not required in the same way it is in a rate case, for example. Staff has made allegations that Laclede has admitted or denied, thereby defining what Staff must prove at hearing.

WHEREFORE, Staff prays that the Commission will adopt Staff's version of Issue No. 1 or, alternatively, rely upon the pleadings herein to drefine the issues for hearing; and grant such other and further relief as the Commission deems just. Respectfully Submitted,

## s/ Kevin A. Thompson

**KEVIN A. THOMPSON** Chief Staff Counsel Missouri Bar No. 36288

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## **Certificate of Service**

I hereby certify that a true and correct copy of the foregoing was served, either electronically or by hand delivery or by First Class United States Mail, postage prepaid, on this **29<sup>th</sup> day of June, 2011**, on the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

s/ Kevin A. Thompson