

JEROME A. DIEKEMPER  
CARY HAMMOND  
RICHARD SHINNERS  
JOHN A. TURCOTTE, JR.  
JOSEPH W. LARREW  
PAUL C. HETTERMAN  
JAN BOND  
JANET E. YOUNG  
GREG A. CAMPBELL  
KARL SAUBER  
RICHARD P. PERKINS  
ANN G. DALTON  
JANINE M. MARTIN  
KIMBERLY J. BETTISWORTH  
SHERRIE A. SCHRODER  
RICHARD C. WELCH  
JOHN RABBITT  
DOROTHY WALSH RIPKA

**DIEKEMPER, HAMMOND,  
SHINNERS, TURCOTTE AND LARREW, P.C.**

ATTORNEYS AND COUNSELORS  
SUITE 200  
7730 CARONDELET AVENUE  
ST. LOUIS (CLAYTON), MISSOURI 63105

(314) 727-1015  
FAX (314) 727-6804  
TOLL FREE 1-888-727-1015

February 21, 2001

**FILED<sup>3</sup>**

FEB 22 2001

Missouri Public  
Service Commission

**VIA AIRBORNE EXPRESS**

The Honorable Kevin Thompson  
Regulatory Law Judge  
Missouri Public Service Commission  
Governor Office Building  
200 Madison  
Post Office Box 360  
Jefferson City, Missouri 65102

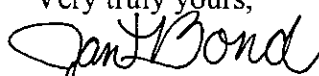
**RE: In the Matter of the Application of Laclede Gas Company  
for an Order Authorizing Its Plan to Restructure Itself Into  
a Holding Company, Regulated Utility Company, and  
Unregulated Subsidiaries, Case No. GM-2001-342**

Dear Judge Thompson:

As the record in the referenced case will reflect, I represent Intervenors PACE Local 5-6 and PACE Local 5-194, labor unions representing physical and clerical employees of Laclede Gas Company. As you may recall, Mike Pendergast, counsel for Laclede Gas, and I spoke to you today by telephone about the possibility of continuing the prehearing conference in this case, presently scheduled for next Tuesday, February 27, 2001, for two weeks, to March 13, 2001. During that telephone conversation, I represented to you that counsel for the PSC Staff and for the Office of the Public Council consented to this request. Further, at the time of the conversation, I believed that the request for a continuance was to be a joint request made by Laclede Gas Company and the unions.

As of late this afternoon, however, Mr. Pendergast has informed me that the Company cannot consent to my request to continue the prehearing conference (and the date for filing the proposed procedure schedule), although I understand that that is not necessarily the Company's final position on my request. I am thus enclosing a request for a continuance from just the Intervenors. Because I have a multi-day labor arbitration involving discharges beginning next week and must now devote almost all my time to preparations for those matters, time is of the essence for me, and I thus feel that I cannot wait for Laclede's final position before presenting the enclosed request.

Very truly yours,

  
JAN BOND

JB/bas  
Enclosures

cc: Clifford Snodgrass, Esq.  
Douglas Micheel, Esq.  
Michael C. Pendergast, Esq.

FILED<sup>3</sup>

FEB 22 2001

Missouri Public  
Service Commission

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

In the Matter of the Application of	)	
Laclede Gas Company for an Order	)	
Authorizing Its Plan to Restructure	)	
Itself Into a Holding Company,	)	Case No. GM-2001-342
Regulated Utility Company, and	)	
Unregulated Subsidiaries.	)	

**REQUEST FOR CONTINUANCE OF  
PREHEARING CONFERENCE AND DATE  
FOR FILING OF PROCEDURAL SCHEDULE**

Come now Intervenors, Paper, Allied-Industrial, Chemical, and Energy Workers Local No. 5-6 (Local 5-6), and Paper, Allied-Industrial, Chemical, and Energy Workers Local No. 5-194 (Local 5-194); by counsel, and respectfully request the Commission to continue the prehearing conference from its present setting of February 27, 2001, at 10:00, a.m., to March 13, 2001, at 10:00 a.m.


Local 5-6 and Local 5-194 also respectfully ask the Commission to extend the date for the parties to file a proposed procedural schedule from the present deadline of March 6, 2001, to March 20, 2001.

Mr. Clifford Snodgrass, counsel for the Staff of the Public Service Commission, and Mr. Douglas Micheel, counsel for the Office of the Public Counsel, both consent to the granting of this extension request. The undersigned has attempted to obtain the consent of Applicant, Laclede Gas Company, to this request, but the Company has neither given its consent nor indicated its final position on the request.

This request is made in good faith and not to hinder or to delay the resolution of this matter. Local 5-6 and Local 5-194 were just granted intervention status and the prehearing conference was just scheduled by Order dated February 13, 2001, by which

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time counsel for the Intervenor already had a conflict for that date concerning a multi-day labor arbitration involving discharges.



JAN BOND, MBN 29227  
DIEKEMPER, HAMMOND, SHINNERS,  
TURCOTTE AND LARREW, P.C.  
7730 Carondelet Avenue, Suite 200  
St. Louis, Missouri 63105  
(314) 727-1015 (Telephone)  
(314) 727-6804 (Fax)  
[janbond@dhstl.com](mailto:janbond@dhstl.com) (E-mail)

Attorneys for Intervenor Local 5-6  
and Local 5-194

**Certificate of Service**

The undersigned hereby certifies that a copy of the foregoing was sent by U.S. Mail, postage pre-paid to:

Michael C. Pendergast, Esq.  
Assistant Vice President & Associate General Counsel  
Laclede Gas Company  
720 Olive Street, Room 1520  
St. Louis, Missouri 63101

Douglas Micheel, Esq.  
Office of the Public Counsel  
P.O. Box 7800  
Jefferson City, Missouri 65101

Clifford Snodgrass, Esq.  
Missouri Public Service Commission  
Post Office Box 360  
Jefferson City, Missouri 65102

this 21st day of February, 2001:

Jan Bond