

LACLEDE GAS COMPANY  
720 OLIVE STREET  
ST. LOUIS, MISSOURI 63101

AREA CODE 314  
342-0532

MICHAEL C. PENDERGAST  
ASSOCIATE GENERAL COUNSEL

January 10, 2000

VIA FACSIMILIE

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
Harry S Truman Building  
301 W. High Street, 5<sup>th</sup> Floor  
Jefferson City, MO 65101

**FILED<sup>2</sup>**  
JAN 10 2000  
Missouri Public  
Service Commission

RE: Case No. GO-2000-394

Dear Mr. Roberts:

Enclosed for filing, please find the original and fourteen copies of the Response of Laclede Gas Company to Staff's Motion to Open Docket in the above-referenced case. Please see that this filing is brought to the attention of the appropriate Commission personnel.

Laclede notes that it is filing copies of a facsimile transmission of its Response pursuant to 4 CSR 240-2.080(3). In accordance with that rule, the original of this Response and this letter are being sent to the Commission by next-day mail.

Thank you for your consideration in this matter.

Sincerely,

*Michael C. Pendergast*  
Michael C. Pendergast

MCP:jaa

cc: Office of the Public Counsel

Enclosure

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>2</sup>

JAN 10 2000

Missouri Public  
Service Commission

In the Matter of Laclede Gas Company's     )  
Experimental Price Stabilization Fund     ) Case No. GO-2000-394

**RESPONSE OF LACLEDE GAS COMPANY  
TO STAFF'S MOTION TO OPEN DOCKET**

COMES NOW, Laclede Gas Company ("Laclede" or "Company") and for its Response to Staff's Motion to Open Docket in the above-captioned case, states as follows:

1. On December 29, 1999, the Staff of the Missouri Public Service Commission ("Staff") filed a Motion to Open Docket for the purpose of monitoring the Company's revised Price Stabilization Program ("revised PSP"), as approved by the Commission in its Report and Order dated June 15, 1999 in Case No. GO-98-484.
2. Laclede has no objection to opening a case for the purposes suggested by Staff. To the contrary, as the letter attached to Staff's Motion indicates, the Company has already voluntarily provided information requested by Staff in connection with Staff's monitoring of the Company's performance under the revised PSP.
3. Laclede does, however, request that the Commission address two items in any Order opening such a case. First, Laclede requests that the Commission issue its Standard Protective Order since much of the information requested by Staff will apparently involve commercially-sensitive matters relating to the Company's procurement of financial instruments. Given the competitive harm that public disclosure of such information could cause Laclede and its customers, and the Commission's prior

practice of issuing such protective orders under similar circumstances (*see e.g.* Case No. GO-98-484), Laclede believes good reason exists to issue such an order in this case.

4. Second, Laclede requests that the Commission adopt a procedure similar to what it has followed in the past for monitoring the Company's PSP. Specifically, Laclede recommends that it be required to submit quarterly reports to the Staff and the Office of the Public Counsel detailing the type of transactional information previously provided by the Company in connection with the revised PSP, including confirmation of the number, purchase and/or sale date, cost and description of each financial instrument transaction undertaken by the Company. Since the Company intends to provide to Staff and Public Counsel by February 1, 2000, a report showing all transactions as of December 31, 1999, it requests that its next report be scheduled for submission on or before May 1, 2000, and then quarterly thereafter.

WHEREFORE, for the foregoing reasons, Laclede Gas Company respectfully requests that the Commission issue its Order: (a) granting Staff's Motion to Open Docket; (b) issuing its Standard Protective Order in this case; and (c) establishing the procedure recommended herein for the submission of quarterly reports detailing the transactional activity undertaken by the Company pursuant to its revised PSP.

Respectfully submitted,



Michael C. Pendergast #31763  
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St. Louis, MO 63101  
(314) 342-0532 Phone  
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**CERTIFICATE OF SERVICE**

Michael C. Pendergast, Assistant Vice President-Associate General Counsel for Laclede Gas Company, hereby certifies that the foregoing Response of Laclede Gas Company to Staff's Motion to Open Docket has been duly served upon all parties of record to this proceeding by placing a copy thereof in the United States mail, postage prepaid, or by hand delivery, on this 10th day of January, 2000.

A handwritten signature in cursive script, reading "Michael C. Pendergast", is written over a horizontal line.