

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

In the Matter of Laclede Gas)	
Company's tariffs designed to permit)	Case No. GT-2009-0026
early implementation of Cold Weather)	Tariff number JG-2009-0033
Rule provisions and to permit Laclede)	
to collect the gas cost portion of its)	
write-off's through the PGA)	

**PETITION OF MISSOURI ENERGY DEVELOPMENT ASSOCIATION FOR
LEAVE TO FILE A BRIEF AS AMICUS CURIAE**

COMES NOW the Missouri Energy Development Association ("MEDA"), pursuant to Missouri Public Service Commission ("Commission") rule 4 CSR 240-2.075(6) and for its request to file a brief as an *amicus curiae* states the following:

1. MEDA is an incorporated trade association whose member companies consist of Union Electric Company, d/b/a AmerenUE; Kansas City Power & Light Company; The Empire District Electric Company; Empire District Gas Company; Laclede Gas Company ("Laclede"); Missouri Gas Energy; Atmos Energy Corporation and Missouri-American Water Company. Each of the member companies are regulated by the Commission as provided by law.

2. MEDA seeks leave of the Commission to file the accompanying brief of *amicus curiae* in the captioned case. MEDA petitions for leave to file its brief to address a policy issue of importance to all regulated utilities in the State of Missouri, that is, that Laclede should be permitted to recover the gas portion of its uncollectible revenues (bad debt expense) through the PGA/ACA process. MEDA submits that Laclede's tariff in this case should be approved for three

major reasons, among others. First, because neither bad debt expenses in general, nor gas costs in particular, can be effectively controlled or predicted, the gas cost portion of bad debt should be included with other gas costs in the PGA mechanism. Second, allowing the gas cost part of bad debt to be reconciled in the PGA will help all of the parties and the Commission to work together to promote reasonable regulatory and social policy measures that affect bad debt, such as collection practices and the Cold Weather Rule. Finally, many other state utility regulatory commissions have already approved some form of adjustment mechanism for the gas cost portion of bad debt.

3. MEDA submits simultaneously herewith an *amicus curiae* brief for the Commission's consideration.

4. The Commission's rule on the filing of *amicus curiae* briefs states the following:

Unless otherwise ordered by the Commission, the brief must be filed no later than the initial briefs of the parties.

The initial post-hearing briefs of the other parties of this case were directed to be filed on February 13, 2009. Consequently, MEDA's brief is timely filed.

WHEREFORE, MEDA requests the Commission accept its *amicus curiae* brief for consideration in the caption matter.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was delivered by first class mail, electronic mail or hand delivery, on the 13th day of February, 2009, to the following:

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