

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

In the Matter of the Application of Laclede	)	
Gas Company for an Accounting Authority Order	)	
Authorizing the Company to Defer for Future Recovery	)	Case No. GU-2007-0137
the Costs of Complying With the Emergency	)	
Amendment to the Commission's Cold Weather Rule	)	

**REQUEST FOR DETERMINATION OF THE COST OF COMPLIANCE  
WITH THE JANUARY 1, 2006 EMERGENCY AMENDMENT  
TO THE COLD WEATHER RULE**

COMES NOW Laclede Gas Company ("Laclede" or "Company") and, pursuant to 4 CSR 240-13.055(14), files this Request for Determination of the Cost of Compliance with the January 1, 2006 Emergency Amendment to the Cold Weather Rule, and in support thereof states as follows:

1. On December 13, 2005, the Commission issued its Order Approving Emergency Amendment (the "Emergency Amendment"), in which it amended, effective January 1, 2006, Commission Rule 4 CSR 240-13.055, entitled "Cold Weather Maintenance of Service," and known as the "Cold Weather Rule."

2. On August 11, 2006, the Commission issued its Order of Rulemaking in Case No. GX-2006-0434, in which it adopted on a permanent basis a number of the provisions that had been placed into effect as part of the Emergency Amendment (such provisions being hereinafter referred to as the "Permanent Amendment"). In addition to permitting customers to reconnect or maintain service by paying the lesser of 50% or \$500 of preexisting arrears, the Permanent Amendment also set forth terms explaining how gas utilities should calculate and recover the costs of complying with the Permanent Amendment. *See* 4 CSR 240-13.055(14)(F) and (G). The Permanent Amendment also specifies that gas utilities may continue to calculate and defer

costs under the Emergency Amendment upon the same terms as those set forth in the Permanent Amendment. 4 CSR 240-13.055(14)(F)4.

3. Pursuant to 4 CSR 240-13.055(14)(G)2, this filing shall serve as Laclede's request for determination of the cost of compliance with the Emergency Amendment for the winter of 2005-06. Consistent with the requirements of 4 CSR 240-13.055(14)(G)2, Laclede has included as Schedule 1 hereto all supporting information required to make a determination of the cost of compliance with the Emergency Amendment, including specific information for each customer account that was extended a cold weather rule agreement during the relevant period. Because this information is customer specific, Laclede requests that it be treated as highly confidential in accordance with the Protective Order that Laclede has also filed for on this date.

**WHEREFORE**, Laclede Gas Company respectfully requests that the Commission determine the costs of compliance with the Emergency Amendment to the Cold Weather Rule as proposed herein.

Respectfully requested,

**/s/ Michael C. Pendergast**

Michael C. Pendergast #31763

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing Request has been duly served on the General Counsel of the Staff of the Missouri Public Service Commission and on the Office of the Public Counsel on this 31st day of October, 2006, by hand-delivery, facsimile, electronic mail, or by placing a copy of such Request, postage prepaid, in the United States mail.

**/s/ Gerry Lynch**

Gerry Lynch