

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

In the Matter of Laclede Gas Company's)	
Purchased Gas Adjustment (PGA) to be)	Case No. GR-2005-0203 and GR-2006-
Audited in its 2004-2005 and 2005-2006)	0288
Actual Cost Adjustment)	

**STAFF RESPONSE TO REQUEST FOR CLARIFICATION
AND MOTION FOR COMMISSION ORDER**

Comes now, Staff, by counsel and in response to Laclede's Request for Clarification states:

1. Laclede's Request is only intended to further delay having to provide LER documents in response to the Commission's October 20, 2008 Order. Since the Commission's Order Granting Motion to Compel, Laclede has taken no apparent action to comply with the Commission's Order.

2. Since the Commission ordered Laclede to produce LER documents, Laclede has filed several motions and responses claiming it shouldn't have to comply with the Commission's decision and seeking an evidentiary hearing before it complies with the Commission's Order by providing discovery. Laclede's notion of trying the case before it provides discovery is novel, but should not be taken seriously. Laclede's real intent is to avoid compliance with the Commission's Order.

3. Section 386.360 provides that whenever a utility is failing to do anything required of it by order of the Commission, then the Commission "shall direct its general counsel...to commence an action in...the circuit court...in the name of the Commission for the purpose of having such violations stopped and prevented either by mandamus or injunction."

4. Staff requests an order from the Commission directing the General Counsel to proceed to circuit court to obtain mandamus or injunction as well as a citation for contempt against Laclede because of its failure and refusal to abide by the Commission's October 20, 2008 Order.

Respectfully submitted,

/s/ Steven C. Reed

Steven C. Reed
Litigation Counsel
Missouri Bar No. 40616

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-3015 (Telephone)
(573) 751-9285 (Fax)
steven.reed@psc.mo.gov (e-mail)

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, e-mailed or transmitted by facsimile to all counsel and parties of record this 5th day of January, 2009.

/s/ Steven C. Reed