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December 29, 1999

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Director, Utility Services

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Director, Administration

DALE HARDY ROBERTS  
Secretary/Chief Regulatory Law Judge

DANA K. JOYCE  
General Counsel

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102

RE: Case No. GO - 2000 - 394

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and fourteen (14) conformed copies of **STAFF'S MOTION TO OPEN DOCKET**.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

*Thomas R. Schwarz, Jr.*  
Thomas R. Schwarz, Jr.  
Deputy General Counsel  
(573) 751-5239  
(573) 751-9285 (Fax)

TRS:sw  
Enclosure  
cc: Counsel of Record

FILED<sup>3</sup>  
DEC 29 1999  
Missouri Public Service Commission

FILED<sup>3</sup>  
DEC 29 1999  
Missouri Public Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>3</sup>

DEC 29 1999

Missouri Public  
Service Commission

In the Matter of Laclede Gas Company's )  
Experimental Price Stabilization Fund. )

Case No. GO-2000-394

STAFF'S MOTION TO OPEN DOCKET

COMES NOW the Staff of the Missouri Public Service Commission, by and through one of its attorneys, and respectfully requests that the Commission enter an Order opening a docket in the above captioned case. In support of this request, the Staff states the following:

(1) On June 15, 1999, the Commission entered an Order granting Laclede Gas Company's (Laclede) request to extend or modify the experimental Price Stabilization Program (PSP) set forth in Case No. GO-98-484.

(2) The Commission approved Laclede's "Alternative B" plan with certain additional modifications "that Laclede agreed to during the hearing and in its posthearing briefs". See the Order in Case No. GO-98-484 (Order).

(3) Part of the modifications that the Commission found Laclede had agreed to was "...a provision giving the Commission the right, but not the obligation, to review the program annually and, if necessary, revise it to correct any major deficiencies on or before February 15 of each year of the program."

(4) Staff seeks to review the program in behalf of the Commission and wishes to open a docket to facilitate the monitoring of the PSP program. Staff proposes to monitor the program through the submission of data requests and other inquiries.

(5) Laclede has advised the Staff in correspondence, attached hereto as Appendix A and incorporated by reference, that GO-98-484 has been closed by the Commission and "no longer provides a basis for the submission of data requests."

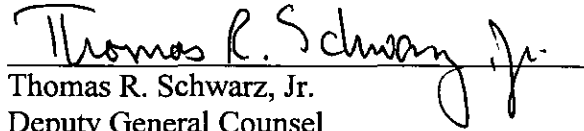
(6) Staff believes that the closure of GO-98-484 does not terminate the responsibility of the Staff to adequately monitor the PSP, should the Commission choose to review the program.

(7) Staff believes that opening a docket to monitor the PSP program would eliminate any misunderstanding on the extent of compliance or obligation to comply with data requests or other inquiries submitted by the Staff to Laclede in connection with the PSP program approved in GO-98-484.

**THEREFORE**, the Staff respectfully requests that the Commission enter an Order opening a docket in this matter for the purpose of monitoring Laclede's PSP program.

Respectfully submitted,

DANA K. JOYCE  
General Counsel

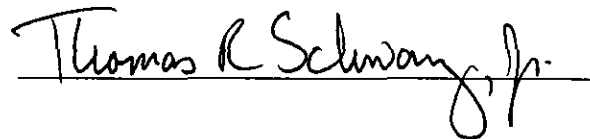


Thomas R. Schwarz, Jr.  
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Missouri Bar No. 29645

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### **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 29<sup>th</sup> day of December, 1999.



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

October 6, 1999

**VIA FEDERAL EXPRESS**

Mr. Mike Wallis  
Missouri Public Service Commission  
Harry S Truman Building  
301 W. High Street  
Jefferson City, MO 65101

RE: Laclede Gas Company  
Price Stabilization Fund

Dear Mike:

Laclede is in receipt of your request for information relating to the Company's modified price stabilization fund which Staff submitted to the Company in connection with Case No. GO-98-484.

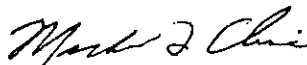
At the outset, the Company notes that Case No. GO-98-484 was closed by order of the Commission on July 21, 1999. As such, that case no longer provides a basis for the submission of data requests. The Company also believes it is under no obligation to provide monthly reports to the Staff since the Commission's order approving the Company's revised price stabilization program did not require such reporting by the Company.

Nevertheless, in the spirit of cooperation with the Staff and in order to keep Staff abreast of the Company's activities in this area, the Company is providing the support which Staff requested for the Company's calculation of the TSP and CPL as well as documentation underlying the transactions undertaken through September 30, 1999 as part of the modified price stabilization program. The Company will provide periodic updates as additional transactions are undertaken.

Please note that these responses are not covered by a protective order of the Commission at this juncture. Nevertheless, the Company respectfully requests that the Staff treat such information as **HIGHLY CONFIDENTIAL** due to the commercially sensitive nature of the enclosed information.

Please call me if you have any questions at (314) 342-0524.

Sincerely,



Michael T. Cline  
Director—Tariff and Rate Administration

**Service List for**

**Case No. \_\_\_\_\_**

**December 29, 1999**

Office of the Public Counsel  
P.O. Box 7800  
Jefferson City, MO 65102

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Thomas M. Byrne  
Laclede Gas Company  
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