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January 20, 2000

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Missouri Public Service Commission

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 the STAFF'S RESPONSE TO LACLEDE GAS COMPANY'S MOTION.

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,

Dennis L. Frey

Assistant General Counsel

(573) 751-8700

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DLF/lb Enclosure

cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Service Commission

In t	the Matter	of Laclede Gas Company's	
Ex	perimental	Price Stabilization Fund	

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Case No. GO-2000-394

STAFF'S RESPONSE TO LACLEDE GAS COMPANY'S MOTION

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission"), and for its Response respectfully states as follows:

- 1. On December 29, 1999, the Staff filed a Motion requesting that the Commission enter and Order opening a docket in the above-captioned case in order to enable Staff to monitor Laclede Gas Company's ("Laclede" or "Company") experimental Price Stabilization Program ("PSP"), which was approved by the Commission in its June 15, 1999 Report and Order in Case No. GO-98-484. The Commission granted Staff's request in its Order Opening Case and Directing Notice, dated January 11, 2000.
- 2. On January 10, 2000, Laclede filed a Response to the aforementioned Staff Motion, wherein, in addition to requesting that the Commission grant Staff's Motion and issue its standard Protective Order, the Company asked that the Commission adopt a procedure similar to that which it has followed in the past for monitoring Laclede's PSP. Specifically, Laclede requested that it be required to file quarterly reports to the Staff and the Office of the Public Counsel ("OPC"), detailing the type of transactional information previously provided by the Company in connection with the PSP. The Company went on to state its intention to provide Staff and OPC, by February 1, 20000, with a report of its transactions under the PSP through

December 31, 1999 and requested that the next such report be scheduled for submission "on or before May 1, 2000, and then quarterly thereafter."

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- 3. On January 14, 2000, the Commission issued its Order Granting Protective Order, but deferred a ruling on Laclede's request regarding the submission of quarterly reports until after the expiration of the ten-day period within which other parties may respond.
- 4. The Staff has no objections to the Laclede's above-noted reporting proposals <u>provided</u> that the scope of Staff's review is not limited to an audit of the transactions themselves. In order to ensure full and proper evaluation of the PSP, Staff should be authorized to inquire into supporting documentation as well as other aspects of the program, such as the underlying rationales and strategies.

WHEREFORE, the Staff respectfully requests that the Commission issue an Order granting Laclede's proposals regarding submission of quarterly reports, subject to the condition that Staff's continuing evaluation of the PSP shall not be limited in scope to a review of the mere transactions themselves.

Respectfully submitted,

DANA K. JOYCE General Counsel

Dennis L. Frey

Assistant General Counsel Missouri Bar No. 44697

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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 20th day of January 2000.

Service List for Case No. GO-2000-394 Revised: January 20, 2000

Office of the Public Counsel P.O. Box 7800 Jefferson City, MO 65102 Michael C. Pendergast/Thomas M. Byrne Laclede Gas Company 720 Olive Street, Room 1524 St. Louis, MO 63101