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February 13, 2001

FILED³

FEB 13 2001

Missouri Public
Service Commission

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

Re: Case No. GO-2000-394

Dear Judge Roberts:

Enclosed for filing please find the original and eight copies of a Response to Proposed Tariff Modifications.

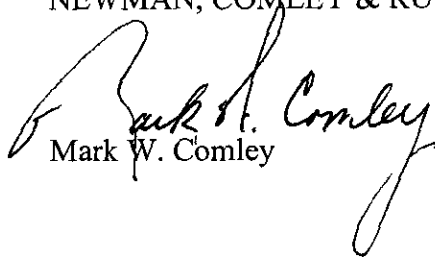
Would you please see that this filing is brought to the attention of the appropriate Commission personnel.

Thank you.

Sincerely,

NEWMAN, COMLEY & RUTH P.C.

By:


Mark W. Comley

MWC:ab

Enclosure

cc: Hon. Vicky Ruth
Doug Micheel, Office of Public Counsel
Thomas R. Schwarz, General Counsel's Office
Michael C. Pendergast

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³
FEB 13 2001
Missouri Public
Service Commission

In the matter Laclede Gas Company's)
Experimental Price Stabilization Fund.) Case No. GO-2000-394

RESPONSE TO PROPOSED TARIFF MODIFICATIONS

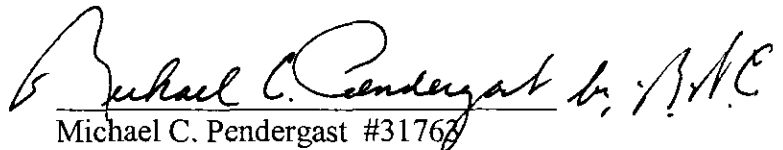
COMES NOW Laclede Gas Company ("Laclede" or "Company") and for its Response to the proposed tariff modifications submitted by the Staff of the Missouri Public Service Commission ("Staff") and the Office of the Public Counsel ("Counsel") in the above-captioned case, states as follows:

1. On or about February 5, 2001, Public Counsel and Staff submitted proposed modifications to the tariff provisions which govern the Company's Price Stabilization Program ("PSP").
2. Laclede does not believe it would be useful or appropriate to provide an extended critique of the submissions made by Staff and Public Counsel. Indeed, absent the opportunity to cross-examine Staff and Public Counsel regarding the effect and implications of their tariff proposals and to submit rebuttal evidence, Laclede does not believe that it can fully and effectively respond to such submissions. Suffice it to say that both proposals would effectively eliminate the PSP and replace it with an entirely new set of rules to govern the Company's hedging activities – rules that Laclede believes would be counterproductive to any effective hedging efforts and, in certain respects, completely unworkable. Such a wholesale and unsupported evisceration of the PSP would also be flatly inconsistent with the terms of the PSP and the Company's tariffs, which specifically contemplate that the PSP may only be "revised," with such revisions being made only

where necessary to correct "major deficiencies" in the program. Neither tariff proposal can be fairly characterized as a "revision" to the PSP and neither has been supported as necessary to "correct a major deficiency." The Commission should accordingly find that such proposed tariff modifications are impermissible.

Wherefore, for the foregoing reasons, Laclede respectfully requests that the Commission find that the proposed tariff modifications submitted by the Staff and Public Counsel on or about February 5, 2001 in the above-referenced case are impermissible under the terms of the Company's PSP and existing tariffs.

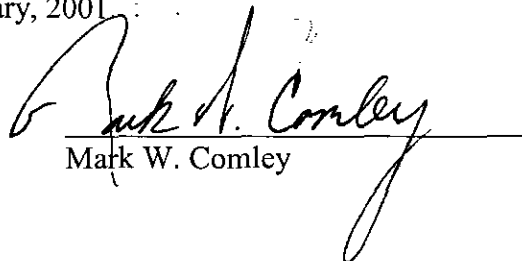
Respectfully submitted,



Michael C. Pendergast #31762
Laclede Gas Company
Assistant Vice President and
Associate General Counsel
Laclede Gas Company
720 Olive Street, Room 1520
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Response to Proposed Tariff Modification has been duly served upon the General Counsel of the Staff of the Public Service Commission, Office of the Public Counsel and all parties of record to this proceeding by placing a copy thereof in the United States mail, postage prepaid, or by hand delivery, on this 13th day of February, 2001.



Mark W. Comley