

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

AREA CODE 314
342-0532

MICHAEL C. PENDERGAST
ASSISTANT VICE PRESIDENT
ASSOCIATE GENERAL COUNSEL

December 12, 2000

VIA FEDERAL EXPRESS

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Governor Office Building
200 Madison Street
P. O. Box 360
Jefferson City, MO 65102-0360

FILED²

DEC 13 2000

Missouri Public
Service Commission

RE: Case No. GS-2000-525
Case No. GC-2001-19

Dear Mr. Roberts:

Enclosed for filing, please find the original and eight copies of the Response to Staff Recommendation in the above-referenced cases. Please file-stamp the additional copy of this Response and return the same in the pre-addressed, stamped envelope provided.

Thank you for your consideration in this matter.

Sincerely,


Michael C. Pendergast

MCP:kz

cc: All parties of record

3. In addition to recommending measures that should further enhance Laclede's ability to respond to emergency situations caused by third party damage, the S&A also proposes a variety of steps for preventing such damage in the first place -- a goal that has been emphasized by Laclede throughout this proceeding. To that end, Laclede commends both the Staff and the Office of the Public Counsel for their willingness to participate in a cooperative effort aimed at preventing such damage, including the kind of facility damage caused by horizontal boring activity that poses the greatest danger to public safety. Laclede believes that all of the measures outlined in the S&A, including: (a) increased efforts to educate utilities and excavators of their obligations under the Missouri One-Call Statute and the Commission's safety regulations relating to the installation of buried cable; (b) increased efforts to monitor and enforce compliance with these statutory and regulatory requirements; and (c) the continued pursuit of legislative initiatives aimed at preventing third party damage; will contribute to the achievement of this common goal. Laclede looks forward to working with the Parties in implementing this joint undertaking, and, in addition to fulfilling its obligations under the S&A, will provide whatever assistance it can to the Commission Staff's own efforts to implement and apply these measures in the future.

WHEREFORE, for the foregoing reasons, Laclede Gas Company respectfully

requests that the Commission approve the Unanimous Stipulation and Agreement filed in these cases on November 2, 2000.

Respectfully Submitted,



Michael C. Pendergast
Assistant Vice President and
Associate General Counsel
Laclede Gas Company
720 Olive Street, Room 1520
St. Louis, MO 63101
(314) 342-0532 Phone
(314) 421-1979 Fax

CERTIFICATE OF SERVICE

Michael C. Pendergast, Assistant Vice President and Associate General Counsel for Laclede Gas Company, hereby certifies that the foregoing Response to Staff Recommendation 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 12th day of December 2000,

