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December 29, 1999

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DALE HARDY ROBERTS
Secretary/Chief Regulatory Law Judge
DANA K. JOYCE
General Counsel

FILED³

DEC 29 1999

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-2000-395

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

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³
DEC 29 1999

Missouri Public
Service Commission

In the Matter of Laclede Gas Company's)
Gas Supply Incentive Plan (GSIP II))

Case No. GO-2000-245

STAFF'S MOTION TO OPEN DOCKET

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and respectfully requests that the Missouri Public Service Commission (Commission) enter an Order opening a docket in connection with the above captioned matter. In support of this motion, the Staff states the following:

(1) On September 9, 1999, the Commission entered an Order in Case No. GT-99-303 (Order) which provided, among other things, that Laclede Gas Company (Laclede) was authorized to implement a Gas Supply Incentive Plan (GSIP II) that was "consistent with the modifications directed by the Commission."

(2) The Order of September 9, 1999 (Order) also indicated that the GSIP II plan would be effective for a one-year term from October 1, 1999 until September 30, 2000.

(3) Staff believes that it has an obligation and responsibility to monitor the GSIP II plan to insure that it is "consistent with the modifications directed by the Commission" unless directed otherwise.

(4) Staff anticipates that Laclede will seek to extend GSIP II prior to its expiration and Staff will need to obtain information from Laclede. Laclede has indicated with reference to

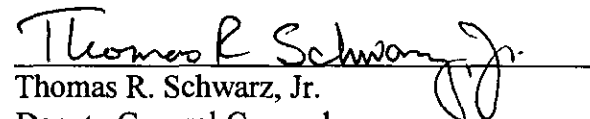
its incentive hedging program, that it is not obliged to provide such information unless there is an open docket. See Appendix A, attached hereto and incorporated by reference herein.

(5) Staff requests that the Commission allow the Staff to monitor the GSIP II plan to facilitate compliance with the directives of the Commission, or otherwise direct the Staff as to its responsibilities in connection with the GSIP II plan.

THEREFORE, the Staff respectfully requests that the Commission enter an Order opening a docket in this matter for the purpose of monitoring Laclede's GSIP II plan, or otherwise directing the Staff as to its responsibilities in connection with this plan.

Respectfully submitted,

DANA K. JOYCE
General Counsel


Thomas R. Schwarz, Jr.
Deputy General Counsel
Missouri Bar No. 29645

Attorney for the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
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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 29th day of December, 1999.

Thomas R. Schwan, Jr.

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.

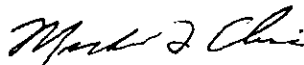
At the outset, the Company notes that Case No. GO-98-484 was closed by order of the Commission on July 21, 1999. As such, that case no longer provides a basis for the submission of data requests. The Company also believes it is under no obligation to provide monthly reports to the Staff since the Commission's 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

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