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June 25, 2001

FILED

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Missouri Public Service Commission

Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission 301 West High Street Jefferson City, MO 65102

Re: Laclede Gas Rate Case No. GM-2001-342

Dear Mr. Roberts:

On behalf of the Missouri Energy Group, I enclose herewith for filing in the above matter, an original and eight (8) copies of its Position Statement on the Issues Proposed, Order of Cross, and List of Witnesses. In addition, this document is being sent to Nancy Dippell via email, pursuant to the Commission's direction. I would appreciate your bringing this filing to the attention of the Commission.

I also enclose one (1) extra copy of the document with the request that it be file stamped and returned to the undersigned in the enclosed self-addressed envelope.

Yours very truly,

Lisa C. Langeneckert

Gangeneckert

Enclosures (11)

cc: All parties of record (w/enc.)

BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI



In the Matter of the Application of Laclede)	Missouri Public Service Commission
Gas Company for an Order Authorizing)	
Its Plan to Restructure Itself Into a Holding)	Case No. GM-2001-342
Company, Regulated Utility Company, and)	
Unregulated Subsidiaries.)	

POSITION STATEMENT, ORDER OF CROSS, AND LIST OF WITNESSES OF MISSOURI ENERGY GROUP

COMES NOW, the Missouri Energy Group ("MEG") and for its Position Statement on the Issues Proposed, Order of Cross, and List of Witnesses states as follows:

MEG Position Statement

1. **Issue:** Does the proposed restructuring have an adverse impact on the present or future rates for the customers of Laclede Gas Company?

MEG Position: The MEG is in opposition to any restructuring change that would adversely impact present or future rates.

- 2. The MEG, at this time, takes no position on the other issues in this case, but reserves the right to take a position on any matter disclosed in the hearing.
- 3. The MEG reserves the right to cross examine any witness to this case, except for the Union witnesses for whom it has waived cross.

Order of Cross

Company

Staff

Public Counsel

Intervenors

List of Witnesses

The MEG will have no witness.

Respectfully Submitted,

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Attorneys for Missouri Energy Group

CERTIFICATE OF SERVICE

Pursuant to 4 CSR 240-2.080 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day caused a copy of the foregoing to be served on all persons on the official service list in Case No. GM-2001-342.

Dated at St. Louis, Missouri this 25th day of June, 2001:

Jan Bond, Esq.Diekemper, Hammond, ShinnersTurcotte and Larrew, P.C.7730 Carondelet Avenue, Suite 200St. Louis, MO 63105

Douglas Micheel, Esq. Office of Public Counsel P.O. Box 7800 Jefferson City, MO 65102

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Clifford Snodgrass, Esq. Public Service Commission P.O. Box 360 Jefferson City, MO 65102

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