## BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Laclede Gas Company's ) Purchased Gas Adjustment for 2005-2006 ) <u>Case No. GR-2006-0288</u>

## THIRD STATUS REPORT AND REQUEST FOR ADDITIONAL EXTENSION

**COMES NOW** Laclede Gas Company (hereinafter "Laclede" or "Company") and, pursuant to the Commission's March 7, 2008 procedural order in this case (the "March 7 Order"), submits its Third Status Report in the above-captioned case. In support thereof, Laclede states as follows:

1. On December 31, 2007, the Staff of the Missouri Public Service Commission ("Staff") filed its Memorandum and Recommendation in this matter ("Recommendation"). Since February 6, 2008, the parties have obtained extensions of Laclede's date to file a response to the Recommendation to allow the parties the opportunity to exchange information and to discuss the issues raised therein with the goal being to narrow or eliminate such issues.

2. The Commission orders approving the requested extensions have required Laclede to file a status report on the progress of these discussions. Accordingly, the Commission's March 20th Order required the Company to file either a response to the Recommendation or a status report by April 11, 2008.

3. As noted in Laclede's last Report, the meetings and discussions that have taken place over the past several months have led to a better understanding between Laclede and Staff on key matters concerning Staff's proposed disallowance of \$2.8 million in this case, and \$1.7 million in the prior year's ACA case. Laclede is currently

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in the process of evaluating an analysis that was prepared by the Staff in response to certain information provided by Laclede and the parties should be in a position to determine whether this issue can be resolved in whole, or in part, within the next two weeks. In addition, progress has also been made in resolving any differences the Staff and Laclede may have had relating to the Staff's non-monetary recommendations in this case. Specifically, Laclede has agreed to Staff's recommendations that:

(a) the Company's Reliability Report address how its pipeline capacity reliably meets the requirements of Laclede's system, including an explanation of how MoGas or other pipeline capacity is necessary to assure that available capacity is sufficient to provide service in the western end of Laclede's service territory;

(b) the Company continue to provide Lange UGS operational data, including for each date the UGS supply feeder pressure, UGS withdrawal, pressure at both Lorentz and Woodsmill, and the temperature;

(c) the Company revise its tariff to tie the charge for natural gas used during curtailments to the higher of \$20 per therm or the daily NYMEX price plus an appropriate adder;

(d) the Company's Reliability Report address whether, and to what extent, reliability is or has been impacted by deferring execution of some winter supply contracts until the months of October or November in the event this should occur in the future;

(e) the Company provide information reconciling nominations to metered volumes.

4. Based on this progress, Laclede submits that a further extension is warranted in this case to continue to pursue potential resolution of these issues. Laclede

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therefore requests that the due date for the filing of its response and/or the filing of a stipulation and agreement or other pleading identifying the issues that have been resolved be extended until May 1, 2008. At this time, Laclede does not anticipate that it will need to seek any further requests of this nature.

5. Laclede has advised counsel for the Staff and the Office of the Public Counsel of this request, and they have indicated that they have no objection to the relief sought herein.

**WHEREFORE**, for the foregoing reasons, Laclede respectfully requests that the Commission accept this Status Report and issue an Order extending until May 1, 2008, the due date for the filing of Laclede's Response in this case and/or a stipulation and agreement or other pleading identifying the issues that have, subject to Commission approval, been resolved as a result of the parties discussions.

Respectfully submitted,

## <u>/s/ Michael C. Pendergast</u>

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## **CERTIFICATE OF SERVICE**

Gerry Lynch hereby certifies that the foregoing pleading has been duly served upon the General Counsel of the Staff and the Office of the Public Counsel by email or United States mail, postage prepaid, on this 10th day of April, 2008.

/s/ Gerry Lynch
Gerry Lynch