

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

Staff of the Public Service Commission)	
Of the State of Missouri,)	
)	
Complainant,)	
)	
v.)	Case No. GC-2006-0318
)	
Laclede Gas Company,)	
)	
Respondent.)	
)	
Office of the Public Counsel,)	
)	
Complainant,)	
)	
v.)	Case No. GC-2006-0431
)	
Laclede Gas Company,)	
)	
Respondent.)	

SUPPLEMENTAL RESPONSE TO STAFF’S POST-HEARING COMMENTS

COMES NOW Laclede Gas Company (“Laclede” or “Company”) and for its Supplemental Response to the Post-Hearing Comments submitted by the Staff of the Missouri Public Service Commission (“Staff”) in this proceeding, states as follows:

1. On November 15, 2006, Laclede filed a Response to Staff’s Post-Hearing Comments in which the Company urged the Commission to adopt an option that Staff had suggested for disposing of the Stipulation and Agreement filed in these consolidated cases by Laclede, the Office of the Public Counsel and USW Local 11-6. Specifically, Laclede urged the Commission to approve the Stipulation and Agreement (“Stipulation”) in resolution of all of the issues in these proceedings. In support of that request, Laclede

noted that the issues resolved by the Stipulation were inextricably linked to any issues that may have been raised by the Staff. Indeed, that is precisely why these cases were consolidated by the Commission last May and why the parties' respective testimony and pleadings all address similar claims and issues. Consistent with paragraph 12 of the Stipulation, Laclede also pointed out that the measures set forth in the Stipulation were more than sufficient to fully and fairly resolve all of the issues raised in these proceedings. Among other things, such measures would effectively provide "no-fault" relief to all customers who received catch-up bills after more than 12 months of consecutive estimated bills. Moreover, such relief would be provided regardless of how many notices a particular customer may have received, how many efforts the Company may have made to gain access to the customer's meter, and notwithstanding the fact that the customer actually used the gas for which the credit is being given.

2. Given these considerations, Laclede continues to believe that the measures set forth in the Stipulation represent an extraordinarily responsive, complete and consumer-friendly resolution of any issues that may have been raised in these proceedings. Nevertheless, if the Commission concludes for any reason that it should not adopt Staff's option of approving the Stipulation as a resolution of all of the issues in these proceedings (an option which no party opposes), Laclede requests that it schedule an evidentiary hearing as soon as reasonably possible so that the Stipulation and Agreement, and its relationship to any other issues Staff may choose to argue have not been resolved, can be addressed. Moreover, Laclede requests that the Commission do so before it disposes of the Stipulation so that the parties will have full knowledge of what the Commission believes is being resolved by its approval, and what is not being

resolved, and meaningfully assess whether that determination is consistent with their own understanding of the provisions of the Stipulation.

3. Let there be no misunderstanding. Laclede believes the Commission should approve the Stipulation and Agreement *now* in resolution of all issues so that Laclede can go about the task of implementing the measures that have been proposed for assisting customers during the AMR transition process. And Laclede believes there is no valid basis for delaying such a determination given the agreements that have been reached and Staff's prior representation that it does not oppose the Stipulation, its statement during the presentation of the Stipulation that it would "probably not" proceed with any additional action in these cases, and its post-hearing statement that the Commission may adopt the Stipulation as a resolution of all issues. Nevertheless, if the Commission deems that any unresolved issues remain, fundamental fairness dictates that such issues and the Stipulation and Agreement be considered together.

WHEREFORE, for the foregoing reasons, Laclede respectfully requests that the Commission approve the Stipulation and Agreement in resolution of all issues in these consolidated cases.

Respectfully Submitted,

/s/ Michael C. Pendergast

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Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing pleading was served on the General Counsel of the Staff of the Missouri Public Service Commission, the Office of Public Counsel, and USW Local No. 11-6, on this 20th day of November, 2006 by United States mail, hand-delivery, email, or facsimile.

/s/ Rick Zucker