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Missouri Public
Service Commission

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
P.O. Box 360
Jefferson City, Missouri 65102

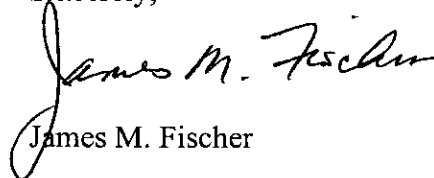
RE: *In the Matter of the a Proposed Rulemaking to Consolidate Filing
Requirements Into a New Chapter 3*

Dear Mr. Roberts:

Enclosed for filing in the above-referenced matter is an original and eight (8) copies of Comments Of Laclede Gas Company.

Copies of the foregoing have been hand-delivered, emailed or mailed this date to counsel for all parties of record. Thank you for your attention to this matter.

Sincerely,


James M. Fischer

Enclosures

cc: Office of the Public Counsel
General Counsel

2. The abovereferenced issue of the *Missouri Register* contains 76 pages of proposed changes. The basis of these changes appears to be, as stated in the Order, to establish a new Chapter 3 of the Commission's Rules that will contain filing and reporting requirements that are currently dispersed among the various rules. In these Comments, Laclede seeks to confirm that the reorganization of rules is not intended to have any substantive effect, and that in particular Rules 3.270, 3.280, 3.290 and 3.295 are merely reference rules and do not involve changes from the rules to which they refer. Further, Laclede recommends that certain definitions in Rule 3.200 should be removed because there is no rule in the 3.205-295 series that uses such defined terms.

2. The rule changes published in the *Missouri Register* propose to add, amend or rescind numerous rules. In the “Purpose” section of many of these rule changes, the Commission recites language similar to the following:

This amendment reflects a reorganization of the commission’s rules regarding general filing requirements in that requirements mirroring those found in the sections being deleted from this rule are being adopted in various rules of the commission’s new Chapter 3.” (From 4 CSR 240-40.040)

The commission is rescinding this rule from this chapter and adopting nearly identical requirements mirroring those found in the rule in a new rule in the commission’s new Chapter 3, as a part of an overall reorganization of the commission’s rules regarding general filing requirements. (From 4 CSR 240-45.010).

Thus, it appears that these rule changes are not intended to, and therefore should not, represent substantive changes to any current rules. Laclede requests that the Commission confirm that these rule changes are not substantive, but simply a reorganization of current rules.

3. Certain of the rules in the natural gas section, specifically rules 4 CSR 240-3.270, 280, 290, and 295, appear to be “reference” rules; that is, they are rules that merely refer the reader to other rules. Again, Laclede requests that the Commission confirm that the language contained in these reference rules do not place independent obligations on gas corporations outside of the obligations contained in the rules to which they refer.

4. The purpose of Proposed Rule 4 CSR 240-3.200 is to set forth the definitions of certain terms used in rules 4 CSR 240-3.205-295. However, several of the definitions in proposed rule 3.200 are not actually used in rules 3.205-295.

Laclede recommends that any unused definitions be deleted from proposed rule

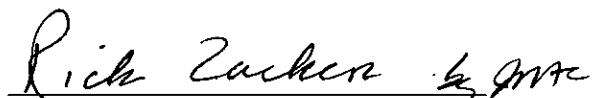
3.200. The unused definitions include the following:

- (1) Affiliate;
- (2) Affiliated entity;
- (3) Affiliate transaction;
- (6) Control;
- (20) Transportation of gas

It is our understanding that the above definitions applied to filing and reporting requirements associated with affiliate transaction rules. These filing and reporting requirements were originally included in the Chapter 3 rules but were subsequently removed. To avoid confusion, the associated definitions should also be removed.

5. Due to the breadth of the rule changes and the short timeframe allowed to provide written comments, Laclede may not have been able to capture in this filing all of the issues it may wish to raise. The Company reserves the right to supplement its comments at the public hearing in this matter scheduled for October 25, 2002.

Respectfully submitted,

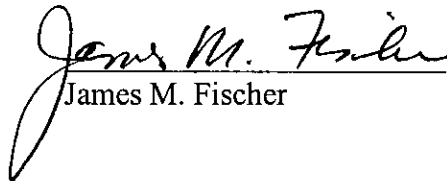


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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Comments have been duly served upon the General Counsel of the Staff of the Public Service Commission by fax, email or by placing a copy thereof in the United States mail, postage prepaid, on this 16th day of October, 2002.


James M. Fischer