

LACLEDE GAS COMPANY
720 OLIVE STREET
ST. LOUIS, MISSOURI 63101

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Thomas M. Byrne
Associate Counsel

June 20, 1996

VIA FEDERAL EXPRESS

Mr. David L. Rauch
Executive Secretary
Missouri Public Service Commission
301 West High Street, 5th Floor
Truman State Office Building
Jefferson City, MO 65101

Re: Case No. AX-96-301

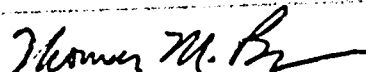
Dear Secretary Rauch:

Enclosed for filing in the above-referenced case, please find an original and fifteen (15) copies of Laclede Gas Company's ("Laclede") Reply Comments.

Please date-stamp "filed" and return to me the additional copy.

Thank you for your assistance.

Very truly yours,



Thomas M. Byrne

TMB:af
Enclosures

FILED
JUN 20 1996
MISSOURI
PUBLIC SERVICE COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the matter of the proposed)
amendments to Commission's rules)
4 CSR 240-20.030, 4 CSR 240-30.040,) Case No. AX-96-301
4 CSR 240-40.040, 4 CSR 240-50.030,)
4 CSR 240-61.020, and proposed)
rule 4 CSR 240-10.080)

REPLY COMMENTS OF LACLEDE GAS COMPANY

I. Introduction

On May 1, 1996, the Missouri Public Service Commission ("Commission") caused to be published in the Missouri Register a proposed rule, and proposed amendments, addressing annual reports to be filed by utilities under the Commission's jurisdiction. In the Notice, the Commission directed interested parties to file initial comments by June 5, 1996 and reply comments by June 20, 1996.

II. General Information

Laclede is a natural gas distribution public utility and a Missouri corporation authorized to do business in the State of Missouri with its principal office located at 720 Olive Street, St. Louis, Missouri 63101. As a public utility subject to the Commission's jurisdiction, Laclede has an obvious and direct interest in the above proposed revisions to the Commission's rules.

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Any correspondence and other communications in regard to these reply comments should be addressed to:

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III. Reply Comments

Laclede did not file any initial comments in this proceeding. However, Laclede offers the following comments regarding two of the issues raised in the initial comments of the Commission Staff. First, the Staff has asked the Commission whether the practice of some utilities of filing annual reports based on fiscal year data rather than calendar year data is acceptable. Laclede files its annual reports based upon the data contained in its audited financial statements for its fiscal year ending September 30. Thus, Laclede is directly affected by the answer to this question. In Laclede's view, the Commission should definitely continue to accept annual reports based on fiscal year data. Indeed, many companies, including Laclede, simply do not have audited financial data for periods, other than their fiscal years.

Second, the Staff has recommended that the Commission require all requests for extensions of the deadline for filing annual reports to be filed two weeks prior to the

normal filing deadline. Laclede opposes this requirement because problems might well develop in the last two weeks prior to the deadline. Consequently, utilities should have the opportunity to request an extension of time for filing their annual reports at any reasonable time before the normal filing deadline.

Respectfully submitted,



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