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May 1, 2001

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P. O. Box 360
Jefferson City, MO 65102

FILED

MAY 2 2001

Missouri Public
Service Commission

RE: Case No. GT-2001-329

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a **STAFF REPLY**

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Thomas R. Schwarz, Jr.

Thomas R. Schwarz, Jr.
Deputy General Counsel
(573) 751-5239
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TRS:rr
Enclosures
cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

MAY 2 2001

Missouri Public
Service Commission

In the Matter of Laclede Gas Company's)
Tariff Filing to Implement an)
Experimental Fixed Price Plan and Other)
Modifications to its Gas Supply Incentive)
Plan.

Case No. GT-2001-329

STAFF'S REPLY YO LACLEDE'S RENEWED REQUEST

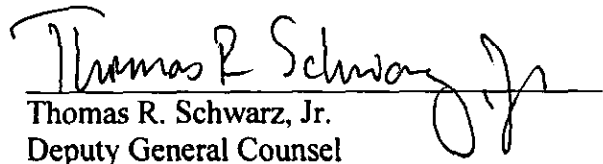
1. On April 18, 2001, the Staff filed a Motion seeking Commission authorization to use certain information provided by other Missouri local gas distribution companies in its rebuttal testimony in this case. Various of those LDCs filed to intervene in this case and to oppose such use, and Laclede Gas Company also opposed the motion. The Commission has scheduled the motion for decision at its agenda session on May 3, 2001.

2. On May 2, 2001, Laclede renewed its earlier-filed request for a sweeping Commission order enforcing a discovery request concerning information that the Staff does not yet have authority to use in this case. Laclede insists that it must undertake complete ACA reviews of all Missouri LDCs for a period of years; that it must have all information needed to conduct full ACA reviews; that it will conduct such reviews in the next thirty days, or so; and that to give it less than all such information will somehow deprive it of due process. Laclede also suggests that it will need an extension until June 7, 2001, to file its surrebuttal testimony. Staff notes that granting Laclede until June 7, 2001, for its filing will deprive Staff of discovery on Laclede's surrebuttal.

3. As Staff indicated in its earlier response to Laclede and others, discovery demands are premature unless and until the Commission grants Staff's motion and Staff files its testimony. Staff acknowledges that Laclede will be entitled to discovery, but suggests that, given the nature of Staff's testimony to be filed Friday, May 4, the extent of Laclede's needs are far less than Laclede now demands. Staff will work with Laclede to resolve discovery disputes as promptly as possible, but respectfully suggests that the issue is not ripe for Commission resolution at this time.

Respectfully submitted,

DANA K. JOYCE
General Counsel


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Deputy General Counsel
Missouri Bar No. 29645

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 2nd day of May, 2001.

Thomas R Schwab Jr.