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May 14, 2001

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

FILED³
MAY 14 2001
Missouri Public
Service Commission

**RE: Laclede Gas Company,
Case No. GT-2001-329**

Dear Mr. Roberts:

Enclosed for filing in the above referenced case, please find the original and 8 copies of **Public Counsel's Request for Leave to File Surrebuttal Testimony and Motion for Expedited Treatment**. Please "file stamp" the extra enclosed copy and return it to this office. I have on this date mailed, faxed, or hand-delivered the appropriate number of copies to all counsel of record.

Thank you for your attention to this matter.

Sincerely,

Douglas E. Micheel
Senior Public Counsel

DEM:kh

cc: Counsel of Record

Enclosure

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

FILED³
MAY 14 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

**PUBLIC COUNSEL'S REQUEST FOR LEAVE
TO FILE SURREBUTTAL TESTIMONY AND
MOTION FOR EXPEDITED TREATMENT**

COMES NOW the Office of the Public Counsel and for its Request to File Surrebuttal Testimony and Motion for Expedited Treatment shows the Commission as follows:

1. The Commission on or about February 15, 2001 issued its Order Adopting Procedural Schedule and further suspending tariff. This Order scheduled the filing of Laclede Gas Company's surrebuttal testimony on May 17, 2001. Said Order did not allow any other parties to file surrebuttal testimony. Subsequently the deadline for filing surrebuttal testimony was extended to May 24, 2001 by an Order dated May 3, 2001.

2. On or about May 4, 2001, the Staff filed its rebuttal testimony wherein it set out its proposal for allowing Laclede Gas Company an opportunity to profit from its natural gas procurement activities. Staff's testimony requests the establishment of a new and different type incentive plan for Laclede Gas Company.

3. The Office of the Public Counsel wishes to respond and raise any concerns it may have regarding Staff's proposed new incentive proposal.

4. 4 CSR 240-2.130(7)(d) provides that surrebuttal testimony shall be limited to material which is responsive to matters raised in another parties rebuttal testimony. The Office of

the Public Counsel seeks leave to file surrebuttal testimony to the matters raised by the Staff in its rebuttal testimony filed in this matter.

5. Public Counsel has contacted the Staff and the Staff does not object to Public Counsel filing such surrebuttal testimony. Public Counsel has also made Laclede Gas Company aware of its intention to file said surrebuttal testimony.

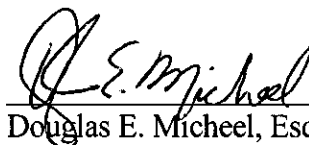
6. Public Counsel requests that the Commission grant this request expedited treatment and issue a ruling on the request no later than May 22, 2001. Public Counsel believes it is important that the Commission receive Public Counsel's input on any proposal made to allow an incentive on Laclede Gas Company's natural gas procurement. Public Counsel has filed this pleading as soon as it could have after reviewing and analyzing the rebuttal testimony filed by the Staff in this matter.

WHEREFORE, the Office of the Public Counsel requests the Commission issue its order allowing Public Counsel to file surrebuttal testimony in the above-referenced matter no later than May 22, 2001 and for other relief which the Commission deems appropriate.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

BY:



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been faxed, mailed or hand-delivered to the following counsel of record on this 14th day of May, 2001:

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