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June 11, 2001

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Secretary/Chief Regulatory Law Judge

DANA K. JOYCE
General Counsel

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

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 **PROPOSED LIST OF ISSUES**.

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,

David A. Meyer by D. W.

David A. Meyer
Associate General Counsel
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DAM:sw
Enclosures
cc: Counsel of Record

FILED²

JUN 11 2001

Missouri Public
Service Commission

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

FILED³
JUN 11 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

PROPOSED LIST OF ISSUES

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), Office of the Public Counsel, and Laclede Gas Company, and respectfully state as follows:

1. On November 17, 2000, Laclede Gas Company ("Laclede") filed with the Missouri Public Service Commission ("Commission") tariff sheets setting forth modifications to its Gas Supply Incentive Program, which was scheduled to expire on September 30, 2001.

2. Subsequently, in response to the Staff's Motion to Suspend the tariff sheets, the Commission established this case to consider the future of the Gas Supply Incentive Program ("GSIP"). On February 15, 2001, the Commission issued its Order Setting Adopting Procedural Schedule and Further Suspending Tariff, wherein the Commission required the parties to develop and agree upon a list of issues to be determined by the Commission in this case.

3. Pursuant to the ordered procedural schedule, the parties have assembled the following list of issues. The listing of issues below is not to be considered as an agreement by any party that any particular listed issue is, in fact, a valid or relevant issue. Indeed, in the subsequent filing of position statements, some parties may state that they consider a particular listed issue to not be a valid issue. This "non-binding" listing of issues is not to be construed as impairing any party's ability to argue about any of these issues or related matters, or to restrict the scope of its response to arguments made by other parties.

4. Intervenor Union Electric Company d/b/a AmerenUE has authorized the parties signing below to represent to the Commission that it supports the proposed list of issues contained in this pleading. Intervenor Utilicorp United Inc., d/b/a Missouri Public Service and d/b/a St. Joseph Light & Power has no objection to the list.

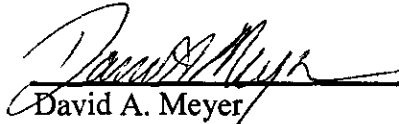
List of Issues

- (A) Should an incentive mechanism similar in structure to the Company's current Gas Supply Incentive Plan ("GSIP"), an alternative incentive mechanism, or no incentive mechanism, be used in connection with the management of Laclede's gas supply and transportation assets on and after September 30, 2001?
- (B) If an incentive mechanism is used, what should be the terms of such a mechanism?
 - (1) How should Laclede's gas supply commodity and demand costs be incorporated in to the structure?
 - (2) What provision, if any, should be made for the use of fixed price contracts and/or instruments?
 - (3) How should firm transportation pipeline discounts be incorporated into the incentive mechanism?
 - (4) How should pipeline mix be incorporated into the incentive mechanism?
 - (5) What treatment should be afforded to capacity release credits or revenues?
 - (6) What treatment should be afforded to revenues from off-system sales?
 - (7) How should any savings or revenues associated with these components be determined and allocated between Laclede and its customers and what role, if any, should baselines play in that process?

- (8) Should an earnings cap be placed on the savings and revenues retained by Laclede?
- (9) Should a specific term for the incentive mechanism be established?
- (10) How should bundled sales and transportation contracts be treated?
- (C) If an incentive mechanism is not used, what alternative can or should be implemented in its place?

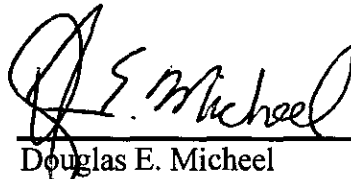
Respectfully submitted,

DANA K. JOYCE
General Counsel



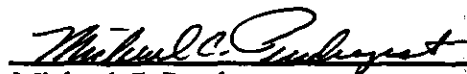
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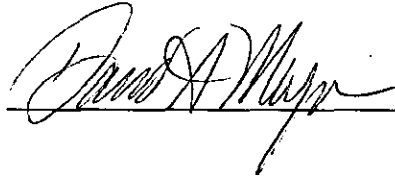


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**ATTORNEY FOR LACLEDE GAS
COMPANY**

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 11th day of June, 2001.



**Service List for
Case No. GT-2001-329
Verified: June 11, 2001 (SW)**

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