

LACLEDE GAS COMPANY  
CASE NO. GT-2001-329

Requested By: Douglas E. Micheel

Requested From: Bruce Henning

Date of Request: May 31, 2001

Information Requested: Does Mr. Henning believe that Laclede Gas Company is in a "captive" position regarding any pipeline serving Laclede Gas Company? If yes, please explain what pipeline[s] Laclede Gas Company is a "captive" and why Mr. Henning believes Laclede Gas Company is captive. If no, please explain why Laclede Gas Company is not "captive" to the pipeline[s] that serve Laclede Gas Company.

This Response Includes:

Printed Materials \_\_\_\_\_ Total Pages \_\_\_\_\_ Magnetic Media \_\_\_\_\_ Number of  
disks \_\_\_\_\_ or  
tapes \_\_\_\_\_

Please number each section of multiple pages as: \_\_\_\_\_ File formats for data: \_\_\_\_\_

# of Total #

LIST PRINTED MATERIALS AND/OR FILES INCLUDED:

**SEE COMPANY'S RESPONSE ON THE ATTACHED SHEET**

The information provided to the Office of the Public Counsel in response to the above information request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform the Office of the Public Counsel if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

DATE RECEIVED: \_\_\_\_\_ SIGNED BY: \_\_\_\_\_

TITLE \_\_\_\_\_

Exhibit No. 40  
Date 6/18/01 Case No. GT-2001-329  
Reporter KRM

Laclede Gas Company  
GSIP-III  
Case No. GT-2001-329  
Office of the Public Counsel  
Data Request No. 5005

- A. For any individual LDC, the degree to which they are captive to a pipeline serving that LDC can only be fully determined by an in-depth analysis of the configuration of their distribution system including the ability to serve specific areas in their service territory, their specific operating conditions, their customer mix, their peakshaving and storage assets, their contract portfolio and other local market conditions. I have not conducted an in-depth analysis of his sort, so I do not have an opinion as to the degree to which Laclede is a captive customer.