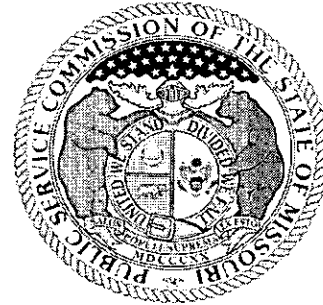


Notice of *Ex Parte* Contact

TO: Data Center
All Parties to Case Nos. GC-2006-0313
GC-2006-0060
GC-2006-0390

FROM: Nancy Dippell 
Deputy Chief Regulatory Law Judge

DATE: April 26, 2006



On April 24, 2006, each of the Commissioners and I received the attached letters from State Representatives Timothy P. Green, Jane Bogetto, Sue Schoemehl, Fred Kratky, and Maria Chapelle-Nadal. The Commission is currently considering the issues discussed in these letters in Case Nos. GC-2006-0313, GC-2006-0060, and GC-2006-0390, which are contested cases. In contested cases, the Commission is bound by the same *ex parte* rule as a court of law; that is, to avoid off-the-record discussions going to the merits of the contested case.

Although communications from members of the public and members of the General Assembly are always welcome, those communications must be made known to all parties to a contested case so that those parties have an opportunity to respond. According to the Commission's rules (4 CSR 240-4.020(8)), when a communication (either oral or written) concerning a contested case occurs outside the hearing process, any member of the Commission or Law Judge who received the communication must prepare a written report concerning the communication and submit it to each member of the Commission and to the parties to the case. The report shall identify the person or persons who participated in the *ex parte* communication, the circumstances which resulted in the communication, the substance of the communication, and the relationship of the communication to a particular matter at issue before the Commission.

Therefore, I submit this report on behalf of myself and the Commissioners pursuant to the rules cited above. This will ensure that any party to these cases will have notice of the attached information and a full and fair opportunity to respond to the comments contained therein.

Attachments

cc: Commissioners
Executive Director
Secretary/Chief Regulatory Law Judge
General Counsel



Rec'd
4-24-06
JD

MISSOURI SENATE

JEFFERSON CITY



TIMOTHY P. GREEN
13TH DISTRICT

DISTRICT OFFICE
ROSEMARY CIRA
314-868-4859

April 19, 2006

ROOM 330, STATE CAPITOL
JEFFERSON CITY, MISSOURI 65101
573-751-2420
FAX: 573-751-1598
timothy_green@senate.mo.gov
TDD 573-751-3969

Missouri Public Service Commission
Governor Office Building
PO Box 360
Jefferson City, MO 65102-0360

Attn: Deputy Chief Regulatory Law Judge Nancy Dippell
Commissioners Davis, Appling, Clayton, Gaw and Murray

Re: GC-2006-0313, GC-2006-0060 and GC-2006-0390

Dear Judge Dippell, Commissioners Davis, Appling, Clayton, Gaw and Murray:

I am writing to stress the importance of the referenced cases currently pending before you concerning Laclede Gas Company ("Laclede"), each of which relates, at least in part, to Laclede's cessation of or attempt to cease performing a service that it has traditionally performed for customers. Specifically:

- In Case No. GC-2006-0313, Laclede has been challenged for ceasing to perform meter inspections and in-house gas appliance inspections following the changing of gas meters, simply because they are performing the change through the use of a Grunsky Bag, which does not require Laclede to turn off the gas supply to the house. While the use of the Grunsky Bag may reduce the risk during meter changes of safety hazards associated with turning off the gas supply, there continue to be other safety reasons for thorough inspections at the time of changing a meter. For example, such inspections catch irregularities in gas flow that may cause a pilot light to extinguish, resulting in gas seepage.
- In Case No. GC-2006-0060, Laclede's request to cease performing inspections known as "turn off/turn ons" has been challenged. Turn off/turn ons have historically been an important part of Laclede's safety program. These inspections consist of inspecting the meter and every gas appliance in the residence to be sure gas lines are connected and not leaking, valves are turned properly, flues are in proper working order and there is no blockage, carbon build-up or odor of gas that could foreshadow carbon monoxide poisoning or danger of fire or explosion.

Missouri Public Service Commission

April 19, 2006

Page 2

- Case No. GC-2006-0060 also challenges Laclede's request to end its long-standing practice of annual meter reads. This is another safety issue, because meter readers performing annual reads conduct visual inspections and are cognizant of gas odors that may cause them to detect leaks.
- In Case No. GC-2006-0390, Laclede has been challenged for its use of persons who are not trained gas professionals to install the automated meter reading device on residential customers' meters on-site. This practice has been ongoing for approximately one year and has resulted in numerous service calls, some of them on an emergency basis, to correct leaks and other problems arising because an installer drilled entirely through a meter or otherwise ineptly installed the device. In addition, by sending someone other than a gas professional to the customer's residence, Laclede is missing an opportunity, always availed when a gas professional is on-site, for a quick and informal safety review that may locate gas leaks or future safety hazards.


I am greatly concerned that the loss of these services may place my constituents and their property at risk. Accordingly, I urge you to investigate these matters carefully and act very cautiously on these issues. I would further like to see Laclede prohibited from making the referenced changes until your investigation has been completed.

I understand that Laclede takes the position that ceasing these services would lower its costs and, therefore, lower the cost to consumers. However, I have not been apprised of any movement by Laclede to reduce gas rates to consumers. Moreover, Laclede's claim that ceasing turn off/turn on inspections will save customers \$35.00 seems specious in light of the fact that customers were never charged for those inspections until a few years ago, at approximately the time that Laclede decided it wanted to stop performing them.

Finally, I always advocate for the best service for my constituents at the most efficient price. Safety is a major component of obtaining the best service. I would rather see Laclede and/or customers pay a little more money for safe gas service than obtain cheaper gas service at the cost of their health and property.

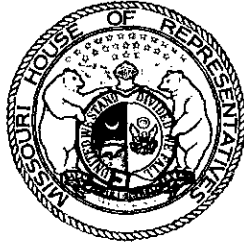
I will continue to monitor these matters. Thank you for your careful consideration.

Sincerely,



Timothy P. Green
Missouri State Senator
District 13

CAPITOL OFFICE
State Capitol
201 West Capitol Avenue
Jefferson City, MO 65101 6806
Tele: (573) 751-5956
Fax: (573) 522-9288
E-Mail:
Jane.bogetto@house.mo.gov



Rec'd 4-24-06
DISTRICT ADDRESS *JD*
417 Gill Avenue
Kirkwood, Missouri 63122
Tele: (314) 909-6676

JANE BOGETTO

State Representative
District 94

April 20, 2006

Deputy Chief Regulatory Law Judge Nancy Dippell
Governor Office Building
200 Madison Street
P.O. Box 360
Jefferson City, MO 65102-0360

Re: GC-2006-0313, GC-2006-0060 and GC-2006-0390

Dear Judge Dippell:

I am writing to stress the importance of the referenced cases currently pending before you concerning Laclede Gas Company ("Laclede"), each of which relates, at least in part, to Laclede's cessation of or attempt to cease performing a service that it has traditionally performed for customers. Specifically:

- In Case No. GC-2006-0313, Laclede has been challenged for ceasing to perform meter inspections and in-house gas appliance inspections following the changing of gas meter, simply because they are performing the change through the use of a Grunsky Bag, which does not require Laclede to turn off the gas supply to the house. While the use of the Grunsky Bag may reduce the risk during meter changes of safety hazards associated with turning off the gas supply, there continue to be other safety reasons for thorough inspections at the time of changing a meter. For example, such inspections catch irregularities in gas flow that may cause a pilot light to extinguish, resulting in gas seepage.
- In Case No. GC-2006-0060, Laclede's request to cease performing inspections known as "turn off/turn ons" has been challenged. Turn off/turn ons have historically been an important part of Laclede's safety program. These inspections consist of inspecting the meter and every gas appliance in the residence to be sure gas lines are connected and not leaking, valves are turned properly, flues are in proper working order and there is no blockage, carbon build-up or odor of gas that could foreshadow carbon monoxide poisoning or danger of fire or explosion.

- Case No. GC-2006-0060 also challenges Laclede's request to end its long-standing practice of annual meter reads. This is another safety issue, because meter readers performing annual reads conduct visual inspections and are cognizant of gas odors that may cause them to detect leaks.
- In Case No. GC-2006-0390, Laclede has been challenged for its use of persons who are not trained gas professionals to install the automated meter reading device on residential customers' meters on-site. This practice has been ongoing for approximately one year, and has resulted in numerous service calls — some of them on an emergency basis — to correct leaks and other problems arising because an installer drilled entirely through a meter or otherwise ineptly installed the device. In addition, by sending someone other than a gas professional to the customer's residence, Laclede is missing an opportunity — always availed when a gas professional is on-site — for a quick and informal safety review that may locate gas leaks or future safety hazards.

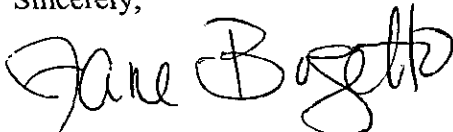
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I understand that Laclede takes the position that ceasing these services would lower its costs and, therefore, lower the cost to consumers. However, I have not been apprised of any movement by Laclede to reduce gas rates to consumers. Moreover, Laclede's claim that ceasing turn off/turn on inspections will save customers \$35.00 seems specious in light of the fact that customers were never charged for those inspections until a few years ago, at approximately the time that Laclede decided it wanted to stop performing them.

Finally, I always advocate for the best service to my constituents at the most efficient price. Safety is a major component of obtaining the best service. I would rather see Laclede and/or customers pay a little more money for safe gas service than obtain cheaper gas service at the cost of their health and property.

I will continue to monitor these matters. Thank you for your careful consideration of each of them.

Sincerely,

A handwritten signature in black ink that reads "Jane Bogetto". The signature is written in a cursive, flowing style with a large, prominent "B".

Jane Bogetto

JB:cs

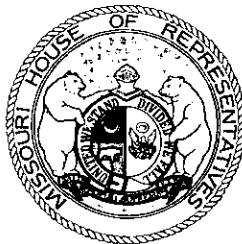
cc: Chairman Jeff Davis
Commissioner Lin Appling
Commissioner Robert Clayton
Commissioner Steve Gaw
Commissioner Connie Murray

CAPITOL OFFICE

201 West Capitol Avenue
Jefferson City, MO 65101-6806
Tele: (573) 751-9804
Fax: (573) 526-4767
sue.schoemehl@house.mo.gov

DISTRICT OFFICE

2629 Bluff Ridge Drive
St. Louis, MO 63129
(314) 846-0717



SUE SCHOEMEHL

State Representative
District 100

COMMITTEES

Professional Registration
and Licensing
Appropriations-Education
Higher Education
Special Committee on
Education Funding

Rec'd
4-24-06
JD

April 20, 2006

Deputy Chief Regulatory Law Judge Nancy Dippell
Governor Office Building
200 Madison Street
PO Box 360
Jefferson City, MO 65102-0360

Re: GC-2006-0313, GC-2006-0060 and GC-2006-0390

Dear Judge Dippell:

I am writing to stress the importance of the referenced cases currently pending before you concerning Laclede Gas Company ("Laclede"), each of which relates, at least in part, to Laclede's cessation of or attempt to cease performing a service that it has traditionally performed for customers. Specifically:

- Case No. GC-2006-0313
- Case No. GC-2006-0060
- Case No. GC-2006-0060
- Case No. GC-2006-0390

I am greatly concerned that the loss of these services may place my constituency, and its property, at risk. Accordingly, I urge you to investigate these matters carefully and act very cautiously on these issues. I would further like to see Laclede prohibited from making the referenced changes until your investigation has been completed.

Finally, I always advocate for the best service to my constituents at the most efficient price. Safety is a major component of obtaining the best service. I would rather see Laclede and/or customers pay a little more money for safe gas service than obtain cheaper gas service at the cost of their health and property.

I will continue to monitor these matters. Thank you for your careful consideration of each of them.

Sincerely,

A handwritten signature in cursive script that reads "Sue Schoemehl". The signature is fluid and extends to the right with a long, sweeping tail.

Sue Schoemehl
District 100

cc: Chairman Jeff Davis
Commissioner Lin Appling
Commissioner Robert Clayton
Commissioner Steve Gaw
Commissioner Connie Murray

State Capitol
201 West Capitol Avenue
Room 101-C
Jefferson City, MO 65101-6806
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Fred.Kratky@house.mo.gov



Committees
Appropriation: General
Administrations
Financial Institutions
Insurance Policy
Job Creation and Economic
Development
Professional Registration and
Licensing

Rec'd
4-24-06
RJ

FRED KRATKY

State Representative
District 65

April 20, 2006

Judge Nancy Dippell
Deputy Chief Regulatory Law Judge
Governor Office Building
200 Madison Street
P.O. Box 360
Jefferson City, MO 65102-0306

Commissioner Robert Clayton
Governor Office Building
200 Madison Street
P.O. Box 360
Jefferson City, MO 65102-0360

Commissioner Jeff Davis
Governor Office Building
200 Madison Street
P.O. Box 360
Jefferson City, MO 65102-0360

Commissioner Steve Gaw
Governor Office Building
200 Madison Street
P. O. Box 360
Jefferson City, MO 65102-0360

Commissioner Lin Appling
Governor Office Building
200 Madison Street
P.O. Box 360
Jefferson City, MO 65102-0360

Commissioner Connie Murray
Governor Office Building
200 Madison Street
P.O. Box 360
Jefferson City, MO 65102-0360

Re: GC-2006-0313, GC-2006-0060 and GC-2006-0390

Dear Judge Dippell and Public Service Commissioners:

I am writing to stress the importance of the referenced cases currently pending before you concerning Laclede Gas Company ("Laclede"), each of which relates, at least in part, to Laclede's cessation of or attempt to cease performing a service that it has traditionally performed for customers. Specifically:

- In Case No. GC-2006-0313, Laclede has been challenged for ceasing to perform meter inspections and in-house gas appliance inspections following the changing of gas meter, simply because they are performing the change through the use of a Grunsky Bag, which does not require Laclede to turn off the gas supply to the house. While the use of the Grunsky Bag may reduce the risk during meter changes of safety hazards associated with turning off the gas supply, there continue to be other safety reasons for thorough inspections at the time of changing a meter. For example, such inspections catch irregularities in gas flow that may cause a pilot light to extinguish, resulting in gas seepage.
- In Case No. GC-2006-0060, Laclede's request to cease performing inspections known as "turn off/turn ons" has been challenged. Turn off/turn ons have historically been an important part of Laclede's safety program. These inspections consist of inspecting the meter and every gas appliance in the residence to be sure gas lines are connected and not leaking, valves are turned properly, flues are in proper working order and there is no blockage, carbon build-up or odor of gas that could foreshadow carbon monoxide poisoning or danger of fire or explosion.
- Case No. GC-2006-0060 also challenges Laclede's request to end its long-standing practice of annual meter reads. This is another safety issue, because meter readers performing annual reads conduct visual inspections and are cognizant of gas odors that may cause them to detect leaks.
- In Case No. GC-2006-0390, Laclede has been challenged for its use of persons who are not trained gas professionals to install the automated meter reading device on residential customers' meters on-site. This practice has been ongoing for approximately one year, and has resulted in numerous service calls—some of them on an emergency basis—to correct leaks and other problems arising because an installer drilled entirely through a meter or otherwise ineptly installed the device. In addition, by sending someone other than a gas professional to the customer's residence, Laclede is missing an opportunity—always availed when a gas professional is on-site—for a quick and informal safety review that may locate gas leaks or future safety hazards.

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Page Three
April 20, 2006

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I will continue to monitor these matters. Thank you for your careful consideration of each of them.

Sincerely,



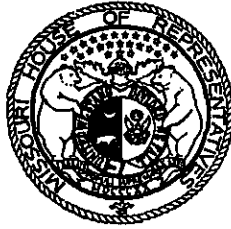
FRED KRATKY
STATE REPRESENTATIVE
District #65

Maria Chappelle-Nadal

State Representative
District 72

DISTRICT OFFICE

8041 Olive Boulevard
University City, MO 63130
Tele: (314) 725-7288



CAPITOL OFFICE

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Tele: (573) 751-4265
Fax: (573) 751-5123
E-Mail:

Maria.ChappelleNadal@house.mo.gov

Rec'd
4-24-06
ND

**MISSOURI
HOUSE OF REPRESENTATIVES**

April 19, 2006

Deputy Chief Regulatory Law Judge Nancy Dippell
Governor Office Building
200 Madison Street
P. O. Box 360
Jefferson City, Missouri 65102-0360

Good Afternoon:

Re: In Case No. GC-2006-0313, GC-2006-0060 and GC-2006-0390

I am writing to stress the importance of the referenced cases currently pending before you concerning Laclede Gas Company ("Laclede"), each of which relates, at least in part, to Laclede's cessation of or attempt to cease performing a service that it has traditionally performed for customers. GC-2006-0313, Laclede has been challenged for ceasing to perform meter inspections and in-house gas appliance inspections following the changing of gas meter, simply because they are performing the change through the use of a Grunsky Bag, which does not require Laclede to turn off the gas supply to the house. While the use of the Grunsky Bag may reduce the risk during meter changes of safety hazards associated with turning off the gas supply, there continue to be other safety reasons for thorough inspections at the time of changing a meter. For example, such inspections catch irregularities in gas flow that may cause a pilot light to extinguish, resulting in gas seepage.

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- In Case No. GC-2006-0390, Laclede has been challenged for its use of persons who are not trained gas professionals to install the automated meter reading device on residential customers' meters on-site. This practice has been ongoing for approximately one year, and has resulted in numerous service calls — some of them on an emergency basis — to correct leaks and other problems arising because an installer drilled entirely through a meter or otherwise ineptly installed the device. In addition, by sending someone other than a gas professional to the customer's residence, Laclede is missing an opportunity — always availed when a gas professional is on-site — for a quick and informal safety review that may locate gas leaks or future safety hazards.

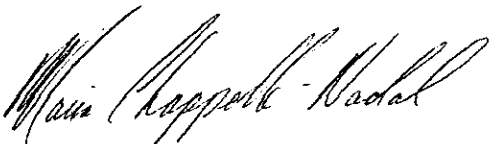
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Finally, I always advocate for the best service to my constituents at the most efficient price. Safety is a major component of obtaining the best service. I would rather see Laclede and/or customers pay a little more money for safe gas service than obtain cheaper gas service at the cost of their health and property.

I will continue to monitor these matters. Thank you for your careful consideration of each of them. If I can be of additional assistance, please do not hesitate to contact me. I value your input concerning legislation that is being considered at this time.

Sincerely,

A handwritten signature in black ink, appearing to read "Maria Chappelle-Nadal". The signature is fluid and cursive, with the first name "Maria" being the most prominent.

Maria Chappelle-Nadal

MCN/lwb