

LAW OFFICE OF ROBERT C. JOHNSON

720 OLIVE STREET SUITE 2400 ST. LOUIS, MO 63101
FAX: (314) 588-0638

Robert C. Johnson
DIRECT: (314) 345-6436
E-MAIL: rjohnson@blackwellsanders.com

Lisa C. Langeneckert
DIRECT: (314) 345-6441
E-MAIL: llangeneckert@blackwellsanders.com

August 22, 2002

VIA FEDERAL EXPRESS

Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Governor Office Building
200 Madison Street
Jefferson City, MO 65102

FILED³

AUG 23 2002

**Missouri Public
Service Commission**

Re: Laclede Gas Rate Case No. GR-2002-356

Dear Mr. Roberts:

On behalf of the Missouri Energy Group, I enclose herewith for filing in the above matter, an original and eight (8) copies of its Statement of Positions and List of Witnesses in the above-referenced matter. Also enclosed is the original and eight (8) copies of the MEG Response to Partial Stipulation and Agreement in the above-referenced matter. An additional copy of each of these documents is enclosed, which I would appreciate your file stamping and returning in the enclosed, pre-addressed envelope.

Yours very truly,



Lisa C. Langeneckert

Enclosures (21)
cc/enc: All parties of record

AUG 23 2002

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

Missouri Public
Service Commission

In the Matter of Laclede Gas Company's)
Tariff to Revise Natural Gas Rate)
Schedules)

Case No. GR-2002-356

**MISSOURI ENERGY GROUP
STATEMENT OF POSITIONS AND LIST OF WITNESSES**

COME NOW the Missouri Energy Group ("MEG"), and pursuant to the Commission's Order Concerning Test Year and True-Up, Granting Intervention, and Adopting Procedural Schedule and Protective Order dated March 19, 2002, presents the following Statement of Positions and List of Witnesses:

1. **Weather Mitigation:** Should a weather mitigation clause, or some other solution, be adopted to reduce fluctuations in cost recovery due to weather?

MEG Position: The MEG takes no position on this issue at this time.

2. **Class Cost of Service:** How should Laclede's cost of service be assigned to the customer classes?

MEG Position: Laclede's cost of service should be assigned to the customer classes in a manner consistent with the cost of service study filed in this case by John Mallinckrodt in his rebuttal testimony filed August 2, 2002 on behalf of the Missouri Industrial Energy Consumers ("MIEC").

3. **Rate Design:** How should the Commission implement any revenue-related change it orders in the case?

MEG Position: Any revenue-related change should be implemented in a manner consistent with the cost of service study filed in this case by John Mallinckrodt in his rebuttal testimony filed August 2, 2002 on behalf of the MIEC.

4. **Large Customer Demand Revenue:** What level of large customer demands should be used to compute current revenues?

MEG Position: This is no longer a contested issue

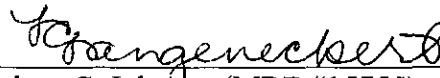
5. The MEG reserves the right to take a position on any matter disclosed in the hearing.

6. The MEG reserves the right to cross examine any witness to this case.

List of Witnesses

The MEG will have no witness.

Respectfully Submitted,



Robert C. Johnson (MBE #15755)

(314) 345-6436

rjohnson@blackwellsanders.com

Lisa C. Langeneckert (MBE #49781)

(314) 345-6441

llangeneckert@blackwellsanders.com

720 Olive Street, 24th Floor

St. Louis, MO 63101-2313

(314) 588-0638 (fax)

Attorneys for Missouri Energy Group

CERTIFICATE OF SERVICE

Pursuant to 4 CSR 240-2.080 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day caused a copy of the foregoing to be served on all persons on the official service list in Case No. GR-2002-356.

Dated at St. Louis, Missouri this 22nd day of August 2002.

Jan Bond, Esq.
Dickemper, Hammond, Shinnars,
Turcotte and Larrew, P.C.
7730 Carondelet Avenue, Suite 200
St. Louis, MO 63105

Thomas Byrne, Esq.
Ameren Services Company
One Ameren Plaza
1901 Chouteau Avenue
P.O. Box 66149, M/C 1310
St. Louis, MO 63166-6149

W. R. England, III, Esq.
Brian T. McCartney
Sondra D. Morgan
Brydon Swearngen & England, PC
P.O. Box 456
Jefferson City, MO 65102

James M. Fischer, Esq.
Larry W. Dority
Fischer & Dority, P.C.
101 Madison Street, Suite 400
Jefferson City, MO 65101

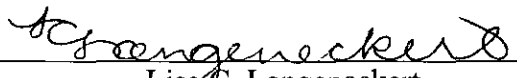
Robert J. Hack, Esq.
Missouri Gas Energy
3420 Broadway
Kansas City, MO 64111-2404

Douglas E. Micheel, Esq.
Senior Public Counsel
Office of Public Counsel
P.O. Box 7800
Jefferson City, MO 65102-7800

Michael Pendergast, Esq.
Vice President and
Associate General Counsel
Laclede Gas Company
720 Olive Street, Suite 1520
St. Louis, MO 63101

Lera L. Shemwell, Esq.
Associate General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Diana M. Vuylsteke, Esq.
Bryan Cave L.L.P.
One Metropolitan Square
211 North Broadway, Suite 3600
St. Louis, MO 63102-2750



Lisa C. Langeneckert