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July 3, 2002

The Honorable Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102-0360

Re: Case No. EC-2002-1

Dear Judge Roberts:

Please find enclosed for filing the original and eight copies of Laclede Gas Company's Statement of Positions.

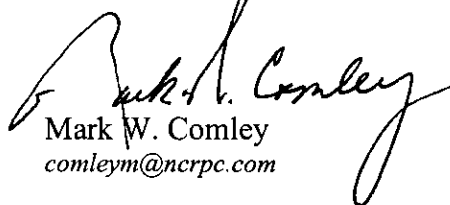
Would you please see that this filing is brought to the attention of the appropriate Commission personnel.

Thank you.

Sincerely,

NEWMAN, COMLEY & RUTH P.C.

By:

  
Mark W. Comley  
comleym@ncrpc.com

MWC:ab

Enclosure

cc: Office of Public Counsel  
General Counsel's Office  
Michael C. Pendergast  
James J. Cook  
Lisa C. Langeneckert  
James M. Fischer  
Samuel E. Overfelt  
Diana M. Vuylsteke  
Robin E. Fulton  
Ronald Molteni

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

Staff of the Missouri Public	)	
Service Commission,	)	
	)	
Complainant,	)	
	)	
vs.	)	Case No. EC-2002-1
	)	
Union Electric Company,	)	
d/b/a AmerenUE,	)	
	)	
Respondent.	)	

**LACLEDE GAS COMPANY'S  
STATEMENT OF POSITIONS**

COMES NOW Laclede Gas Company (hereinafter "Laclede"), pursuant to the Commission's *Order Regarding Position Statements and Marking of Exhibits* issued on July 1, 2002, and respectfully submits its Statement of Positions on the issues set forth in the List of Issues filed in this matter on June 27, 2002.

**Introduction**

1. As set forth below, Laclede has submitted testimony in this case on rate design issues relating to the summer/winter differential in the energy charge component of AmerenUE's rates and AmerenUE's Rider E tariff provisions. Although Laclede has not taken a specific position on the other issues that have been raised in this case, it wishes to advise the Commission that it generally supports the use of incentive or alternative regulation plans as an effective means of achieving superior results for customers, utilities and the public generally. As in any other case, Laclede also believes it is critically important that the Commission resolve the

traditional ratemaking issues in this case in a manner that recognizes the indivisible tie between a utility's ability to perform its public service obligations and the level of financial resources that widely-shared and long-standing ratemaking principles would indicate are necessary to achieve that goal.

2. Laclede concurs with the statement contained in the Proposed List of Issues, Order of Witnesses and Order of Cross-Examination, that "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." Indeed, Laclede reserves its right to argue, brief, and fully participate with regard to any matter or issue arising in this proceeding.

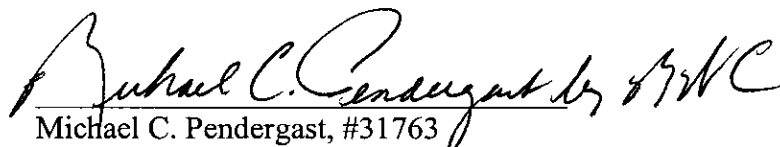
#### **Statement of Positions**

3. Laclede takes no specific position at this time on the issues contained in the List of Issues submitted on June 27, 2002, except for the following:

44. Rate Design: How should the Commission implement any revenue change it orders in this case and address proposed revisions to existing tariff riders?

**Laclede's Position: (a) Summer/Winter Energy Charge Differential:** Laclede recommends that the Commission reject the increase in the summer/winter energy charge differential proposed by AmerenUE in this case and instead adjust each Residential Service rate energy charge by the same percentage as the overall percentage change required for all energy charges in the Residential Service rate. **(b) Rider E:** Laclede recommends that service under AmerenUE's Rider E not be limited to a voltage selected by the Company but instead be made expressly available to customers taking service at secondary as well as primary voltages.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael C. Pendergast by M.C.", written over a horizontal line.

Michael C. Pendergast, #31763  
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**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered or mailed, postage prepaid, this 3rd day of July, 2002, to:

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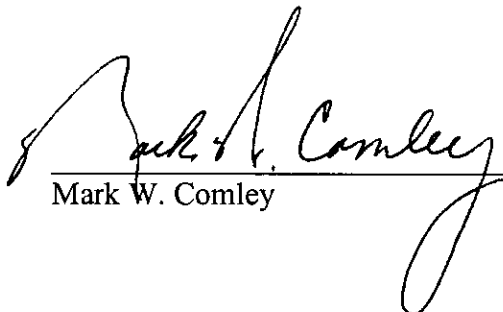
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