NEWMAN, COMLEY & RUTH

PROFESSIONAL CORPORATION ATTORNEYS AND COUNSELORS AT LAW MONROE BLUFF EXECUTIVE CENTER 601 MONROE STREET, SUITE 301 P.O. BOX 537 JEFFERSON CITY, MISSOURI 65102-0537

June 21, 2001

TELEPHONE: (573) 634-2266 FACSIMILE: (573) 636-3306

ROBERT K. ANGSTEAD MARK W. COMLEY CATHLEEN A. MARTIN STEPHEN G. NEWMAN JOHN A. RUTH D. GREGORY STONEBARGER ALICIA EMBLEY TURNER

> 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. GR-2001-629

Dear Judge Roberts:

Enclosed for filing in the above-referenced matter please find the original and eight copies of a Motion for True-Up Audit and Hearing, and Recommendation Concerning Test Year.

Would you please see that these filings are brought to the attention of the appropriate Commission personnel.

Thank you.

Sincerely,

NEWMAN, COMLEY & RUTH P.C.

By:

comleym@ncrpc.com

MWC:ab Enclosure

cc:

Office of Public Counsel General Counsel's Office Michael C. Pendergast

Jan Bond

Lisa Langeneckert

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of Laclede Gas Company's)	
Tariff to Revise Natural Gas Rate)	Case No. GR-2001-629
Schedules.)	

MOTION FOR TRUE-UP AUDIT AND HEARING

COMES NOW Laclede Gas Company ("Laclede" or "Company") and for its

Motion for True-Up Audit and Hearing, states as follows:

- 1. By Order dated June 7, 2001, the Commission directed Laclede to file on or before June 21, 2001 any request for a true-up audit and hearing.
- 2. Pursuant to the Commission's Order, Laclede requests that the Commission schedule a true-up audit and hearing, as such hearing is provided for in the current procedural schedule for January 14-15, 2002, in order to permit certain items that will be known and measurable through November 30, 2001, or such later date as can be accommodated by the procedural schedule ultimately adopted in this proceeding, to be recognized in rates. Pursuant to such Commission Order, the Company submits the following specification of accounts or items of expense, revenues and rate base to be considered in such true-up:
 - (a) revenues associated with customer additions;
 - (b) rate base components and associated depreciation and property taxes;
 - (c) changes in wages, salaries, and benefits including employee levels;
 - (d) rate case expense;

- (e) changes in the gas safety deferrals associated with the accounting authorization granted to Laclede in Case No. GR-99-315;
 - (f) insurance expense; and
 - (g) changes in capital structure.
- 3. Laclede believes that the items specified above represent a balanced package of adjustments that will prevent any improper mismatch of expenses, revenues and rate base. Laclede also believes that such items can be reasonably audited and reflected in rates within the time frames recommended herein.

WHEREFORE, for the foregoing reasons, Laclede Gas Company respectfully requests that the Commission schedule a true-up audit and hearing in accordance with the recommendations set forth herein.

Respectfully Submitted,

Michael C. Pendergast #31763

Assistant Vice President

Associate General Counsel

Laclede Gas Company

720 Olive Street, Room 1520

St. Louis, MO 63101

(314) 342-0532 Phone

(314) 421-1979 Fax

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Motion for True-Up Audit and Hearing has been duly served upon the General Counsel of the Staff of the Public Service Commission, Office of the Public Counsel and all parties of record to this proceeding by placing a copy thereof in the United States mail, postage prepaid, or by hand delivery, on this 2/1/2/ day of June, 2001.