

LACLEDE GAS COMPANY  
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RICK ZUCKER  
ASSISTANT GENERAL COUNSEL-REGULATORY

January 23, 2003

VIA FEDERAL EXPRESS

FILED<sup>3</sup>

JAN 24 2003

Missouri Public  
Service Commission

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
Governor Office Building  
200 Madison Street  
P. O. Box 360  
Jefferson City, MO 65102-0360

RE: Case No. GO-2002-1099

Dear Mr. Roberts:

Enclosed for filing, please find the original and eight copies of Laclede's Response to Staff's January 13, 2003 Status Report in the above-referenced case. Please file-stamp the additional copy of this Response and return the same in the pre-addressed, stamped envelope provided.

Thank you for your consideration in this matter.

Sincerely,

  
Rick Zucker

RZ:kz

cc: All parties of record

**FILED<sup>3</sup>**

JAN 24 2003

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

Missouri Public  
Service Commission

**In the Matter of Laclede Gas )  
Company's Transfer of its Gas Supply )  
Function to a Separate Corporation. )**

**Case No. GO-2002-1099**

**LACLEDE GAS COMPANY'S RESPONSE TO  
STAFF'S JANUARY 13, 2003 STATUS REPORT**

**COMES NOW** Laclede Gas Company ("Laclede" or "Company") and submits its Response to Staff's Status Report filed on January 13, 2003, in the referenced case, and states as follows:

1. In paragraph 2 of the Status Report, Staff states that during the week of January 6-10, "Staff received responses to data requests sent pursuant to the Commission order of November 11, 2002, resolving a discovery dispute." Staff's statement may inadvertently give the impression that data request responses ordered by the Commission in November were not provided by Laclede until early January. Laclede is filing this response to clarify the facts regarding this matter.

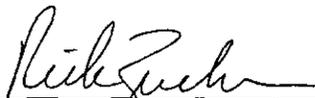
2. On November 14, 2002, the Commission issued its Order Granting in Part and Denying in Part Staff's Motion to Compel. The Order required Laclede to provide answers to Staff Data Requests 3909, 3911, 3915, 3942 and 3944, no later than December 6, 2002. Laclede sent such answers on November 27, 2002, via overnight mail.

3. On December 19, 2002, Laclede received 15 additional Data Requests from Staff in this case. Laclede timely answered these requests by overnight mail sent on January 7, 2003. It is these responses to data requests sent to Laclede subsequent to the

Commission's November 14, 2002 Order that Staff must be referring to in its Status Report.

WHEREFORE, Laclede respectfully requests that the Commission accept this response to the Staff's Status Report.

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing Response has been duly served upon the General Counsel of the Staff of the Public Service Commission and the Office of Public Counsel by fax, email or by placing a copy thereof in the United States mail, postage prepaid, on this 23rd day of January, 2003.

