

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²
FEB 14 2001

Missouri Public
Service Commission

In the Matter of Laclede Gas Company's Purchased)
Gas Adjustment Tariff Revisions to be Reviewed) Cases No. GR-2001-387
in its 2000-2001 Actual Cost Adjustment)

**MOTION FOR WAIVER TO MAKE A SECOND UNSCHEDULED
WINTER PURCHASED GAS ADJUSTMENT FILING**

COMES NOW Laclede Gas Company ("Laclede" or "Company") and in support
of its Motion for Waiver to Make a Second Unscheduled Winter Purchased Gas
Adjustment Filing, states as follows:

1. In the transmittal letter accompanying its January 15, 2001 unscheduled winter PGA filing, the Company indicated that it would seek to make another unscheduled filing to reduce its rates in the event subsequent declines in wholesale gas prices made such a filing feasible. In approving the filing, the Commission also urged Laclede, as it had other LDCs, to file for an unscheduled reduction in its PGA rates in the event natural gas prices were to drop. See *Order Approving Interim Rates*, Case No. GR-2001-387 (dated January 25, 2001). In its February 13, 2001 *Order Modifying the Price Stabilization Program* ("PSP") in Case No. GO-2000-394, the Commission also indicated its desire that Laclede follow through on its offer to flow through to its customers on an expedited basis certain financial benefits achieved by Laclede as a result of the hedging program previously approved by the Commission. In addition, the Commission urged Laclede to work with the Staff and Public Counsel in implementing the reconciliation process found in the PSP, so that ratepayers could receive a financial benefit more quickly.

2. Consistent with these Orders, and the Company's previous commitments, the Company has filed contemporaneously with this Motion a tariff sheet in the above-captioned case which is designed to reduce the Company's PGA rates through the implementation of a second unscheduled winter PGA filing. Such a reduction will allow ratepayers to receive more quickly \$20 million of the financial benefits achieved by the Company under the PSP and will also serve to reflect the effects of falling wholesale gas prices.

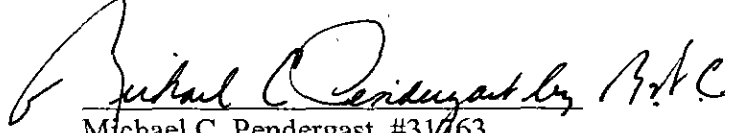
3. The waiver requested herein is necessary to effectuate this filing. Pursuant to the terms of the Stipulation and Agreement approved by the Commission in Case No. GO-97-401, and the provisions of Laclede's Purchased Gas Adjustment ("PGA") tariff, the Company is normally permitted to make no more than one unscheduled PGA filing during the Winter period, which it has already done. Moreover, under the terms of its PSP, the Company would normally be permitted to flow through any hedging gains only at the time it makes its next Winter PGA filing. Laclede accordingly requests that pursuant to its general authority under §393.140(11) RSMo., and in accordance with the foregoing Orders, the Commission grant Laclede a waiver from the terms of its PGA tariff and PSP program in order to permit this additional filing and this accelerated return of hedging gains achieved under the PSP.

4. As directed by the Commission, Laclede will, of course, continue to work with Staff and Public Counsel in implementing the reconciliation process provided for in the PSP for any other gains or cost savings achieved under the program.

Wherefore, for the foregoing reasons, Laclede respectfully requests that the Commission grant the Company's Motion for any waivers that may be required to

implement the second unscheduled winter PGA filing submitted by Laclede on this date
in the above-captioned case.

Respectfully submitted,

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

Michael C. Pendergast #31763

Laclede Gas Company

Assistant Vice President and

Associate General Counsel

Laclede Gas Company

720 Olive Street, Room 1520

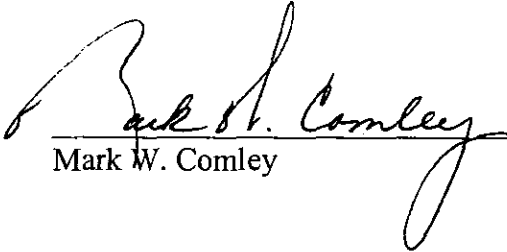
St. Louis, MO 63101

(314) 342-0532 Phone

(314) 421-1979 Fax

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion For Waiver to Make a Second Unscheduled Winter PGA Filing 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 14th day of February, 2001.


Mark W. Comley