LACLEDE GAS COMPANY 720 OLIVE STREET ST. LOUIS, MISSOURI 63101 (314) 342-0601

KENNETH J. NEISES EXECUTIVE VICE PRESIDENT ENERGY & ADMINISTRATIVE SERVICES

March 8, 2002

FILED³ MAR 0 8 2002

Service Commission

HAND DELIVERED

Mr. Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission Governor Office Building 200 Madison Street Jefferson City, MO 65101

RE: Case No. GR-2001-387

Public Service Commission

Dear Mr. Roberts:

Enclosed herewith for filing with the Missouri Public Service Commission are the following revised tariff sheets, which are applicable to all divisions of Laclede Gas Company ("Company"):

P.S.C. MO. No. 5 Consolidated, Eleventh Revised Sheet No. 22 P.S.C. MO. No. 5 Consolidated, One Hundred Ninetieth Revised Sheet No. 29

These tariff sheets are being filed in conjunction with the accompanying Motion For Expedited Treatment.

The purpose of these tariff sheets, which have an issue date of March 8, 2002, and an effective date of April 8, 2002, is to terminate the Actual Cost Adjustment ("ACA") factor that became effective November 19, 2001 and that is applicable to customers who purchase gas from the Company under the Large Volume Transportation and Sales Service ("LVTSS") rate schedule.

On November 2, 2001, as part of the Company's scheduled Winter Purchased Gas Adjustment ("PGA") filing, the Company filed a credit ACA factor of \$.10314 per therm that, when applied to estimated annual LVTSS sales volumes of 8,900,000 therms, was designed to distribute to customers over the subsequent twelve-month period a credit balance of \$921,000. Early termination of the factor is warranted because, as shown in the attached schedule, nearly all of such balance has already been distributed to customers through February 2002. Continuation of this unusually large ACA credit could cause certain customers who are served under the LVTSS rate schedule to purchase from the Company much or all of their gas requirements, resulting in the distribution of excessive credits to customers during the current ACA recovery period that, in turn, would likely result in a large ACA surcharge for these customers beginning in November 2002. Even if the Commission approves the expedited effective date requested in the this filing and accompanying motion, the Company conservatively estimates that by the end of this month the Company will have distributed over \$200,000 of excess credits to LVTSS sales customers.

According to the Commission's regulations, the tariff sheets included in the instant filing could not become effective for 30 days except for good cause shown. Since the excess credits quantified above would only be exacerbated by a later effective date, the Commission should permit such tariff sheets to become effective on March 22, 2002 rather than April 8.

I have enclosed three copies of this filing, one of which is for your convenience in acknowledging your receipt thereof.

Sincerely,

Kenneth J. Ne

MTC Enclosures

cc: Office of the Public Counsel

LVTSS SALES ACA BALANCE

Balance per Nov. 2, 2001filing

(\$920,584)

Credits to customers @

\$0.10314 per therm

		% of Sales	•
	LVTSS	Receiving	Amount
	<u>Sales</u>	Credit	Credited
Nov-01	97,873	40%	\$4,038
Dec-01	1,357,594	100%	\$140,022
Jan-02	2,044,431	100%	\$210,863
Feb-02 (est.)	5,320,979	100%	\$548,806
s/t	8,820,877		\$903,729
Undistributed Balance	ce @ 2/28/02		(\$16,855)

P.S.C. MO. No Consolidated, Eleventh Revis Sheet No. 22 CANCELLING P.S.C. O. No. 5 Consolidated, Tenth Levised Sheet No. 22

Laclede Gas Company	For	Refer to Sheet No. 1
Name of Issuing Corporation or Municipality		Community, Town or City

SCHEDULE OF RATES

C. <u>Deferred Purchased Gas Cost Accounts (Continued)</u>

- 5. Carrying costs shall be applied to certain excesses or deficiencies in gas cost recoveries, which such excesses or deficiencies shall comprise a Deferred Carrying Cost Balance ("DCCB"). The excesses or deficiencies to be included in the DCCB, which shall be computed separately for each of the Company's sales classifications, shall be the product of: (a) the difference between the Company's actual annualized unit cost of gas, net of storage injections and withdrawals, and the estimated annualized unit cost of gas factor included in the Company's then most recent PGA filing, and (b) the volumes of gas sold during such month. Each month, carrying costs, at a simple rate of interest equal to the prime bank lending rate (as published in The Wall Street Journal on the first business day of such month), minus one percentage point, shall be credited to sales customers for any excess recoveries of gas costs or credited to the Company for any deficient recoveries of gas costs only when and to the extent that the DCCB exceeds five percent of the Company's average annual level of gas costs for the then three most recent ACA periods.
- 6. For each twelve-month period ending with the September revenue month, the differences of the comparisons described above including, any carrying costs where applicable, and any balance or credit for the previous year shall be accumulated to produce a cumulative balance of excess or deficiency of gas cost revenue recovery. "Actual Cost Adjustment" (ACA) factors, which shall be included in the Company's Winter PGA filing, as such filing is described in Section E.1, shall be computed by dividing such balances by the applicable estimated sales or transportation volumes during the subsequent twelve-month ended October period for each of the respective sales and transportation classes. Such ACA factors shall remain in effect until superseded by revised ACA factors in the next scheduled Winter PGA filing, except for the LVTSS sales ACA factor that became effective November 19, 2001, in which case such factor shall be terminated on the effective date of One Hundred and Ninetieth Revised Sheet No. 29. All actual ACA revenue recovered shall be debited or credited to the balance of the ACA account as appropriate and any remaining balance shall be reflected in the subsequent ACA computations.

DATE OF ISSUE	March 8, 20)02 Year	DATE EFFECTIVE	April 8, 2002 Month Day	Year
ISSUED BY	K. J. Neises.	Executive Vice Pr	esident, 720 Olive S	St., St. Louis, MC	0 63101

Name of Officer

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Address

P.S.C. MO. No. 5 Consolidated, One Hundred and Ninetieth Line ised Sheet No. 29 CANCELLING P.S.C. MO. No. 5 Consolidated, One Hundred and Eight Linth Revised Sheet No. 29

Laclede Gas Company	For	Refer to Sheet No. 1
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SCHEDULE OF RATES

PURCHASED GAS ADJUSTMENT CLAUSE Adjustment Statement

In accordance with the Company's Purchased Gas Adjustment Clause contained in Sheet Nos. 15 through 28-g, inclusive and the Company's Purchased L.P. Gas Adjustment Clause contained on Sheet No. 8, the following adjustments per therm or per gallon, where applicable, will become effective on and after the effective date of this tariff.

Sales Classification Firm other than LVTSS & VF	Current <u>PGA</u> 33.457¢	<u>ACA</u> (1.207¢)	<u>UACA</u> 0.000¢	Refund (0.000¢)	Total <u>Adjustment</u> 32.250¢
LVTSS and VF	*	(0.000¢)	-	(0.000¢)	*
Seas. & Int.	25.228¢	(5.807¢)	0.000¢	(0.000¢)	19.421¢
L.P.	61.837¢	2.393¢	-	-	64.230¢

<u>Firm Other Than LVTSS & VF</u> sales are rendered under General Service Rate (Sheet No. 2), the Large Volume Service Rate (Sheet No. 5), the Unmetered Gas Light Service Rate (Sheet No. 9), and all special contracts for firm service.

<u>LVTSS</u> sales are rendered under the Large Volume Transportation and Sales Service Rate (Sheet No. 34).

<u>VF</u> sales are rendered under the Vehicular Fuel Rate (Sheet No. 11)

<u>Seasonal and Interruptible</u> sales are rendered under the Seasonal Air Conditioning Service Rate (Sheet No. 4), and the Interruptible Service Rate (Sheet No. 7).

L.P. Gas sales are rendered under the General L.P. Gas Service Rate (Sheet No. 8).

Additional Transportation Charges, ACA Factors and Refunds

<u>Customer Groups</u> Firm	<u>TOP</u>	Capacity <u>Reservation</u> 5.490¢	Other <u>Non-Commodity</u> -	<u>ACA</u> (.076¢)	Refund .000¢
Basic – Firm Sales Prior to 11/15/89	-	-	-	.000¢	.000¢
Basic - Other	-	-	-	.000¢	(.000¢)

DATE OF ISSUE	March 8, 2		DATE EFFECTI			02 Year	***********
ISSUED BY	K.J. Neises.	Executive Vice	President.	720 Olive St	St. Lou	is. MO 6310 [.]	1

K.J. Neises, Executive Vice President, 720 Olive St., St. Louis, MO 63101

Name of Officer Title Address

^{*} Revised each month in accordance with Section A.5 of the PGA clause.