

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³

MAR 08 2002

Missouri Public
Service Commission

In the matter of Laclede Gas Company's)
Filing of Revised Tariff Sheets to Eliminate)
Actual Cost Adjustment Factor)

Tariff No. GR-2001-387

MOTION FOR EXPEDITED TREATMENT

COMES NOW Laclede Gas Company ("Laclede" or "Company"), pursuant to 4
CSR 240-2.080(17), and for its Motion for Expedited Treatment, states as follows:

1. Contemporaneously with the submission of this Motion, Laclede has filed
Eleventh Revised Sheet No. 22 and One Hundred Ninetieth Revised Sheet No. 29
(hereinafter "the Revised Tariff Sheets"). As explained in the transmittal letter
accompanying the Revised Tariff Sheets, the sole purpose of the filing of such Sheets is
to eliminate the current Actual Cost Adjustment ("ACA") credit factor applicable to sales
made under the Company's Large Volume Transportation and Sales Service ("LVTSS")
rate schedule.

2. Laclede is requesting that such credit be eliminated because it is apparent,
based on the sales made to such customers during February, that nearly the entire amount
of the ACA over-collection balance that gave rise to the credit has already been
distributed to such customers due to their purchase of significantly higher than normal
volumes from Laclede. It is equally apparent based on the nominations received from its
LVTSS customers in March, that such transportation customers are continuing to
purchase gas from Laclede under the LVTSS rate schedule at unusually high levels given
the extremely favorable price produced by the large ACA credit. As a consequence,

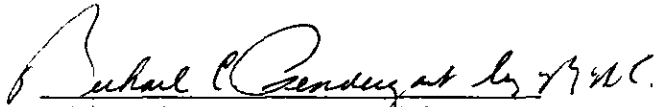
Laclede anticipates that the ACA balance applicable to these customers will begin to reflect a substantial under-recovery of gas costs. This, in turn, will pose significant problems in the future when Laclede attempts to recover this balance from LVTSS customers who can avoid such charges by simply purchasing their gas from alternative sources. Pursuant to §393.140 (11) RSMo. (2000) and Rule 4 CSR 240-2.080(17) of the Commission's Rules of Practice and Procedure, Laclede therefore requests that the Commission permit the Revised Tariff Sheets to become effective by March 22, 2002, or as soon thereafter as reasonably practicable.

3. Expeditious approval of the Revised Tariff Sheets will avoid harm to LVTSS customers who may desire to purchase sales volumes from the Company in the future by ensuring that the prices for such sales volumes will not be artificially increased at that time simply because customers were permitted to purchase sales volumes at below market rates now. At the same time it will do no harm to existing LVTSS customers, since the only effect of eliminating the ACA credit will be to bring Laclede's rates for sales service into line with its current cost of gas and current market prices.

4. In compliance with Rule 4 CSR 240-2.080(17), Laclede would note that it prepared and filed the Revised Tariff Sheets as soon as it reasonably could after its receipt of sales volume information showing the magnitude and impact of its LVTSS customers' purchasing activities on its ACA balance for that customer group.

Wherefore, for the foregoing reasons, Laclede respectfully requests that the Commission issue its order authorizing the Company's Eleventh Revised Sheet No. 22 and One Hundred Ninetieth Revised Sheet No. 29 to become effective by March 22, 2002 or as soon thereafter as is reasonably practicable.

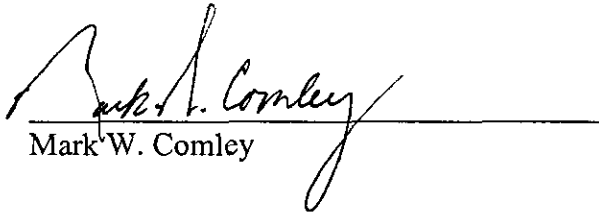
Respectfully submitted,



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Motion 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 8th day of March, 2002.



Mark W. Comley