

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

United Steelworkers of America)	
Local No. 11-6, AFL-CIO)	
Complainant,)	
v.)	Case No. GC-2006-0060
)	
Laclede Gas Company,)	
Respondent.)	

**LACLEDE GAS COMPANY’S FILING REGARDING
ORDER DENYING MOTION TO DISMISS AND
SCHEDULING A PROCEDURAL CONFERENCE**

COMES NOW Laclede Gas Company (“Laclede” or “Company”) and files this pleading regarding the Commission’s Order Denying Motion To Dismiss And Scheduling A Procedural Conference, and in support thereof, states as follows:

1. On August 4, 2005, United Steelworkers of America Local No. 11-6, AFL-CIO (“Local 11-6”) filed a Complaint in the above referenced case. In paragraph 9 of the Complaint, Local 11-6 sought the opportunity to investigate the impact to public safety of certain tariff changes made by Laclede in connection with its implementation of a new automated meter reading (“AMR”) program.
2. On September 7, 2005, Laclede filed its Answer and Motion to Dismiss the Complaint. Local 11-6 responded to Laclede’s pleading on January 20, 2006.
3. On January 24, 2006, the Commission issued its Order Denying Motion to Dismiss and Scheduling a Procedural Conference. The procedural conference was held on February 6, 2006.
4. At the procedural conference, Staff noted that the Complaint was deficient in that it failed to state a request for relief, in accordance with Commission rule 4 CSR

240-2.070(5), and that, given the language in paragraph 9 of the Complaint, it was more appropriate to consider the Complaint to be a request for an investigation. Local 11-6 requested and received leave to amend the Complaint to add a specific request for relief. Local 11-6 also indicated that it would be filing a motion seeking the Commission to immediately require Laclede to conduct inspections in all situations where gas service is transferred to a new customer, including those situations known as “turn-off/turn-on” where the flow of gas is not interrupted. On February 10, 2006, Local 11-6 filed both an Amended Complaint in this case and a Motion for Immediate Relief Pursuant to R.S. MO. Section 386.310.1 (“Motion”).

5. The filing of these documents requires a response from Laclede which may create procedural issues and therefore renders it premature at this time to set a procedural schedule. It is common practice in complaint cases before the Commission to permit the respondent to answer a complaint or amended complaint before setting a procedural schedule. Therefore, Laclede requests that it be afforded an opportunity to file a response to Local 11-6’s Motion within the normal 10 day time period, and to file a response to the Amended Complaint within the normal 30 day time period, prior to revisiting the setting of a procedural schedule.

6. Laclede has shared this pleading with the other parties to this case, and none object to the relief requested herein.

WHEREFORE, Laclede respectfully requests that the Commission defer the requirement to establish a procedural schedule until after Laclede has had an opportunity to respond to Local 11-6’s Motion and Amended Answer.

Respectfully Submitted,

/s/ Michael C. Pendergast

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Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing pleading was served on the Complainant, the General Counsel of the Staff of the Missouri Public Service Commission, and the Office of Public Counsel on this 14th day of February, 2006 by United States mail, hand-delivery, email, or facsimile.

/s/ Rick Zucker