

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

In the Matter of the Verified Application	)	
and Petition of Missouri Gas Energy an	)	
Operating Unit of Laclede Gas Company	)	
to Change its Infrastructure System	)	Case No. GO-2015-0270
Replacement Surcharge in its Missouri	)	
Gas Energy Service Territory	)	

**PUBLIC COUNSEL’S REPLY**

COMES NOW the Office of the Public Counsel, and for its Reply, states:

1. Missouri Gas Energy (MGE), an operating unit of Laclede Gas Company, initiated this case with its April 17, 2015 application requesting approval of a rate increase for MGE's Infrastructure System Replacement Surcharge (ISRS), and further requesting a Commission order approving the application no later than May 31, 2015.

2. On May 1, 2015, the Commission's Staff filed its Staff Recommendation wherein the Staff recommended that the Commission grant MGE an incremental ISRS increase of \$2,814,926, for a total ISRS amount of \$4,805,222.

3. On May 11, 2015, MGE, having previously requested approval by the end of May, filed a motion asking the Commission to further expedite approval of the application, and requested approval of the ISRS change by May 13, 2015.

4. Public Counsel does not oppose an expedited order approving the Staff Recommendation. This non-opposition should not be considered agreement that the ISRS amounts included in MGE's application are just and reasonable, or lawful under the ISRS statutes. §§ 393.1009, 393.1012, and 393.1015 RSMo. Public Counsel retains the right to challenge these costs in MGE's next rate case. *See* § 393.1015(8), (9), and (10).

WHEREFORE, Public Counsel offers this reply to the Staff Recommendation and MGE's motion to expedite.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

By: /s/ Marc D. Poston

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 12<sup>th</sup> day of May 2015:

**Missouri Public Service Commission**

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**/s/ Marc Poston**

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