

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

In the Matter of the Application of Laclede)
Gas Company to Change Its Infrastructure) **Case No. GO-2016-0196**
System Replacement Surcharge in Its)
Laclede Gas Service Territory)

In the Matter of the Application of Laclede)
Gas Company to Change Its Infrastructure) **Case No. GO-2016-0197**
System Replacement Surcharge in Its)
Missouri Gas Energy Service Territory)

POSITION STATEMENT OF STAFF

COMES NOW the Staff of the Missouri Public Service Commission and respectfully submits the following Position Statement of Staff according to the Commission's *Order Scheduling Joint Evidentiary Hearing and Setting Procedural Schedule* issued on April 12, 2016, based on the List of Issues filed herein on April 21, 2016 by Laclede Gas Company:

Issue A. May Laclede and MGE's ISRS filings be updated during the ISRS case to replace two months of budgeted ISRS investments with updated actual ISRS investments?

Staff Position: Yes, as long as Staff has a reasonable opportunity to review the updated information. The Commission decided this exact issue less than six months ago in its *Report and Order* issued on November 12, 2015, in Laclede and MGE's last ISRS cases, Case Nos. GO-2015-0341 and GO-2015-0343. Nothing in the applicable statutes or rules has changed regarding this issue since that *Report and Order*. Nothing of any substance has changed. The Commission should reach the same decision in these cases as it did less than six months ago in the prior cases.

Respectfully submitted,

/s/ Jeffrey A. Keevil

Jeffrey A. Keevil

Missouri Bar No. 33825

Attorney for the Staff of the

Missouri Public Service Commission

P. O. Box 360

Jefferson City, MO 65102

(573) 526-4887 (Telephone)

(573) 751-9285 (Fax)

Email: jeff.keevil@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record this 21st day of April, 2016.

/s/ Jeffrey A. Keevil