

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

In the Matter of the Verified Application)	
and Petition of Laclede Gas Company to)	
Change its Infrastructure System)	Case No. GO-2015-0269
Replacement Surcharge in Its Laclede Gas)	
Service Territory)	

PUBLIC COUNSEL’S REPLY OPPOSING A MAY 13 ORDER

COMES NOW the Office of the Public Counsel, and for its Reply Opposing a May 13 Order, states:

1. Laclede Gas Company initiated this case with its April 17, 2015 application requesting approval of a rate increase for Laclede'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 Laclede an incremental ISRS increase of \$5,524,406, for a total ISRS amount of \$15,322,676.

3. On May 11, 2015, Laclede, having previously requested approval by the end of May, filed an amended motion to expedite approval by May 13, 2015. Laclede also filed a substitute tariff sheet on May 12 that Laclede requested the Commission also approve on May 13.

4. Public Counsel opposes Laclede's amended request to expedite approval of the application by May 13, and further opposes approval of the substitute tariff sheets by May 13, because Public Counsel has concerns that at least five (5) separate work

orders, making up a significant portion of the costs Laclede seeks to recover through the ISRS increase, may not be eligible for ISRS recovery.¹ On May 11 Laclede provided additional explanations to Public Counsel for the work orders in question, but Public Counsel continues to have questions and concerns that Public Counsel will not be able to resolve with Laclede before the Commission's Agenda Meeting on May 13. Accordingly, Public Counsel asks that the Commission deny Laclede's amended request to expedite approval by May 13.

5. If the Commission does not consider this case in its May 13 Agenda Meeting, Public Counsel commits that it will advise the Commission by May 15 that it either does not oppose an order approving the Staff Recommendation, or that Public Counsel requests an evidentiary hearing on the ISRS-eligibility of certain costs.

6. If the Commission considers the application and proposed substitute tariff sheet in its May 13 Agenda Meeting, Public Counsel's position is that it opposes the application and substitute tariff sheet, requests an evidentiary hearing, and asks that the Commission direct the parties to file a proposed procedural schedule.

WHEREFORE, Public Counsel offers this reply opposing an expedited order by May 13, 2015 regarding the application and substitute tariff sheet.

¹ The work orders in question include two (2) work orders that appear to include costs related to telemetric equipment being replaced for reasons other than wear or deterioration.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

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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 12th day of May 2015:

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