BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Craig A. Smith,)
Complainant,)
V.	Case No. GC-2015-0147
Laclede Gas Company,)
Respondent.)

REQUEST BY STAFF FOR ORDER DIRECTING FILING AND FOR COMMISSION TO ACCEPT LATE-FILED STATUS REPORT

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Request for Order Directing Filing and for Leave to Late-File Status Report* ("Request") hereby states:

- 1. The parties to this case Complainant, Laclede Gas Company ("Laclede"), Staff, and the Office of the Public Counsel participated in a prehearing conference on March 11, 2015. Staff filed Status Reports in this matter on March 12, April 10, and May 14, 2015.
 - 2. The last Status Report filed herein stated in paragraph number 3 that:

Laclede reports that it continues to work on plans to change internal processes that will address the issues raised in this case. Laclede is in the process of drafting a stipulation and agreement for the parties' consideration. The agreement will outline the issues raised in this case, and memorialize the changes Laclede has made or will make to resolve those issues. Once the parties reach agreement, they will present the stipulation for Commission approval. The Company believes that it can complete its draft stipulation and submit it to the parties shortly. (Emphasis added)

- 3. Since filing the Status Report quoted above, Staff has not received any draft stipulations from Laclede as described above for its consideration, nor has Staff received any other substantive communication from Laclede regarding this matter. Staff emailed Laclede on August 10 and September 1, 2015 regarding this matter but has received no response from Laclede to its emails as of this filing. Therefore, Staff requests the Commission order Laclede to file in this docket an update regarding Laclede's progress toward changing its internal processes that will address the issues raised in this case as well as its progress toward preparing a draft stipulation for circulation among the parties to this case.
- 4. In an *Order Setting Deadline for Status Report* issued herein on May 14, 2015, Staff was ordered to file a status report no later than June 15, 2015. Due to the withdrawal on June 11, 2015 of counsel previously assigned to this matter, no status report was filed on June 15. Therefore, Staff respectfully requests the Commission accept this filing as its late-filed status report.

WHEREFORE, Staff respectfully requests the Commission accept this filing as its late-filed status report and issue an order directing Laclede to file an update regarding Laclede's progress toward changing its internal processes that will address the issues raised in this case and its progress toward preparing a draft stipulation for circulation among the parties to this case.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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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 9th day of September, 2015.

/s/ Jeffrey A. Keevil