EX4.62

Exhibit No.: Issue:

Witness: Type of Exhibit: Sponsoring Party: Case No.: Pensions and Post-Retirement Benefits Mark D. Waltermire Direct Testimony Laclede Gas Company GR-94-220

FILED
December 27, 2017
Data Center
Missouri Public
Service Commission

LACLEDE GAS COMPANY

GR-94-220

DIRECT TESTIMONY

OF

MARK D. WALTERMIRE

Date 12-201 - G215
File No. G-Reporter 4F

File No. G-Reporter 36

GR-201 - G216

Types of Regulation" (FAS 71) provides that Laclede may, under certain conditions, record a Regulatory Asset or Liability in its balance sheet for the amount of the difference between GAAP and ratemaking methods of determining costs.

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In the event that the Commission were to order recovery of ratemaking pension expenses on a basis other than that requested by Laclede, the Company requests that such order also contain:

- (1) authorization to create a Regulatory Asset or Liability, to be used for recording differences between FAS 87 and FAS 88 pension costs and the amount of pension expense allowed to be recovered in rates,
- (2) authorization to recover the Company's accumulated prepaid pension asset in rates over a reasonable period of time, and
- (3) a statement from the Commission that, if at a later date, it determines that some other basis of measuring pension cost is more appropriate for ratemaking purposes, any deferred amounts remaining in the Regulatory Asset or Liability account at that time would be subject to recovery from or reversion to ratepayers in the future.
- Q. You are also sponsoring the inclusion of the Company's net prepaid pension asset in rate base. How was the amount included in rate base determined?

- A. Net prepaid pension cost included in rate base was

 calculated by adding together estimated April 30,

 1994 accrued pension liability and prepaid pension

 asset account balances for all Company sponsored

 retirement plans.
- 6 Q. Why is the inclusion of the net prepaid pension asset
 7 in rate base appropriate?
- Α. During the past several years, assets in Laclede's qualified pension trusts have performed better than the Company's long-term earnings expectations. the extent that these earnings exceeded expected levels they resulted in gains to the pension plan. The Company's recognition of a portion of these gains through its FAS 87 and FAS 88 calculations, along with contributions to its pension trusts, has result-ed in a net prepaid pension asset.

The recognition of gains from assets does not result in additional cash flow to the Company. This is because funds cannot be withdrawn from a pension trust without incurring severe penalties. Yet, ratepayers have still benefitted from these gains by the inclusion of lower pension costs in rates. The net effect of this treatment has been to lower the Company's revenue requirement and, therefore, its cash flows by the amount of pension asset gains passed through to ratepayers.

In light of the above, I believe it is appropriate that the Company be provided with a return on its

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Section A, RATE BASE
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ORIGINAL COST RATE BASE

(Thousands of Dollars)

Description	April 30, 1994
Utility Plant in Service Natural Gas Stored Underground – Non-Current Other Utility Plant Subtotal of Plant	\$668,831 5,884 22,227 \$696,942
-Deduct: Accumulated Provision for Depreciation of Gas Plant and Provision for Depletion and Amortization of Land, Land Rights and Other Gas Plant in Service Customer Advances for Construction Subtotal of Plant Deductions Net Plant	(\$296,289) <u>(1,301)</u> <u>(\$297,590)</u> \$399,352
Add: Special Deposits Propane Gas Inventory Natural Gas Stored Underground — Laclede Field Natural Gas Stored Underground — MRT Field Prepayments Material and Supplies Materials Management System Deferred Costs Gas Research Institute (GRI) Payments Deferred Deferred Property Taxes Prepaid Pension Asset Insulation Financing Program Loans Cash Working Capital Total Working Capital	\$10 13,241 11,427 28,794 2,290 4,988 480 197 500 14,187 2,000 15,346
-Deduct: Deferred Income Taxes	(47,370)
Original Cost Rate Base	\$445,442