

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

In the Matter of the Application of)	
Laclede Gas Company to Change its)	Case No. GO-2016-0196
Infrastructure System Replacement)	Tariff Filing No. YO-2016-0193
Surcharge in its Laclede Gas Service)	
Territory.)	

In the Matter of the Application of)	
Laclede Gas Company to Change its)	Case No. GO-2016-0197
Infrastructure System Replacement)	Tariff Filing No. YO-2016-0194
Surcharge in its Missouri Gas Energy)	
Service Territory.)	

**PUBLIC COUNSEL’S MOTION FOR
ORDER DIRECTING RECONCILIATION and MOTION FOR
EXPEDITED TREATMENT**

COMES NOW the Missouri Office of the Public Counsel (“OPC”) and for its Motion for Order Directing Reconciliation and Motion for Expedited Treatment, states:

1. The Public Service Commission’s (“The Commission”) May 19, 2016, *Report and Order* (“Order”) granted Laclede Gas Company’s petitions to change its Infrastructure System Replacement Surcharges (ISRS). OPC filed an Application for Rehearing on May 26, 2016, and the Commission denied rehearing on June 1, 2016.
2. OPC intends to appeal the Commission’s Order to the Court of Appeals pursuant to Section 386.510 RSMo, requiring appellants to file “a copy of the reconciliation required by subsection 4 of section 386.420.” Subsection 4 of Section 386.420 RSMo states in part:

In any proceeding resulting in the establishment of new rates for a public utility that is not classified as a price-cap or competitive company, the commission shall cause to be prepared, with the assistance of the parties to

such proceeding, and shall approve, after allowing the parties a reasonable opportunity to provide written input, a detailed reconciliation containing the dollar value and rate or charge impact of each contested issue decided by the commission, and the customer class billing determinants used by the commission to calculate the rates and charges approved by the commission in such proceeding. Such information shall be sufficient to permit a reviewing court and the commission on remand from a reviewing court to determine how the public utility's rates and charges, including the rates and charges for each customer class, would need to be temporarily and, if applicable, permanently adjusted to provide customers or the public utility with any monetary relief that may be due in accordance with the procedures set forth in section 386.520. In the event there is any dispute over the value of a particular issue or the correctness of a billing determinant, the commission shall also include in the reconciliation a quantification of the dollar value and rate or charge impact associated with the dispute.

3. The Order in this case resulted in the establishment of new rates for a public utility company that is not a price cap regulated company and therefore the Commission is required to cause to be prepared the reconciliation as described above. Accordingly, OPC respectfully requests an order from the Commission directing its Staff to prepare the required reconciliation.

4. OPC's appeal must be filed within thirty days of the Commission order denying rehearing. In this case, an appeal must be filed by July 1, 2016 pursuant to Section 386.510 RSMo. The statute requiring the reconciliation also requires the Commission give parties an opportunity to respond to the reconciliation. Accordingly, OPC respectfully requests the reconciliation be expedited and filed no later than Tuesday, June 28, 2016 giving the parties two days to respond before the notice of appeal must be filed. OPC filed this request as soon applicable. No party will be prejudiced by granting the relief requested in this motion.

WHEREFORE, the Office of the Public Counsel respectfully requests an order directing its Staff to file the required reconciliation by June 28, 2016.

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 23rd day of June 2016:

/s/ Marc Poston
