

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

In the Matter of an Investigation into the	)	
Eligibility of Expenses Recovered	)	
Through the Infrastructure System	)	Case No. GO-2017-0081
Replacement Surcharge	)	

MOTION TO CONTINUE DOCKET

COMES NOW the Office of the Public Counsel (“OPC”) and for its Motion to Continue Docket, states:

1. OPC requested the Public Service Commission (“Commission”) open this case to enable OPC to investigate the eligibility of expenses being recovered through the gas Infrastructure System Replacement Surcharges (“ISRS”). Sections 393.1009 to 393.1015 RSMo. The goal is to gain a better understanding of what types of costs Missouri gas companies consider to be eligible for the ISRS, and to better understand the processes used by gas companies to identify ISRS-eligible projects and costs.

2. As a part of OPC’s ongoing investigation, OPC sent data requests and made two project site visits. OPC intends to make additional site visits and issue further data requests to all Missouri gas companies that have charged an ISRS.

3. The Commission opened this case in a September 28, 2016 order that stated in part, “The Commission does not intend for this to be an open-ended, unlimited grant of authority to Public Counsel, therefore, this file will be closed in six months unless Public Counsel shows good cause for an extension of time.” OPC agrees the length of this case should not be open-ended and unlimited, but there exists good cause to allow this case to remain open beyond six months. OPC’s investigation is not complete

and more time is necessary to properly review and understand the ISRS-eligibility criteria and processes used by Missouri's gas companies. OPC requests that this case remain open until the conclusion of Laclede Gas Company's ("Laclede") petition to establish a *new* ISRS following Laclede's upcoming rate case. Since no other gas company comes close to Laclede's levels of costs recovered through an ISRS - and the bulk of the material reviewed by OPC will necessarily be Laclede data - tying the end-date to after Laclede establishes a new ISRS should enable OPC to complete its investigation before Laclede establishes a new ISRS. Any information that could aid the practices and procedures used in an ISRS could then be presented to the Commission as a new ISRS is being established, if necessary.

4. OPC's ability to investigate the ISRS is limited by the amount of resources OPC is able to apply towards the investigation. It has been a challenge to increase OPC's participation in reviewing Laclede's bi-annual ISRS petitions, especially considering that Laclede files on the same day for both Laclede Gas and Missouri Gas Energy ("MGE") – essentially requiring two simultaneous large company ISRS reviews. OPC will be given a short break from those reviews once Laclede's rate case has concluded, and during that time OPC intends to finalize its investigation, and if necessary, bring any concerns to the Commission's attention.

5. It should also be noted that this is the first general investigation by any entity into the ISRS following the 2003 enactment of the ISRS statutes. Good cause exists to allow the representative of the customers required to pay the surcharge to investigate and better understand the costs that are being passed on through the ISRS since there has been no comprehensive review of the ISRS.

6. OPC is hopeful the practices and processes used by Missouri's gas companies to determine ISRS-eligibility will prove to be reasonable. However, until OPC has had ample opportunity to complete its investigation through discovery, through site visits, and through additional research, it would be premature to close this case after only six months.

WHEREFORE, the Office of the Public Counsel respectfully moves the Commission to extend the closing of this case until the conclusion of Laclede's next case to establish an ISRS.

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 20th day of March 2017.

/s/ Marc Poston
