

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

In the Matter of Laclede Gas Company's     )  
2008 PGA Filing.                                     )

**Case No. GR-2008-0387**  
YG-2009-0310

**STAFF RECOMMENDATION**

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and for its Recommendation, states as follows:

1. On October 31, 2008, Laclede Gas Company (Laclede or Company) of St. Louis, Missouri filed a proposed tariff sheet bearing an effective date of November 16, 2008. This tariff sheet was filed to reflect a change in Laclede's Purchased Gas Adjustment (PGA) factor as a result of estimated changes in the cost of natural gas for the upcoming winter season and changes in the Actual Cost Adjustment (ACA) factor. Laclede's winter season is for a 6 month period from November through April.

2. The above-captioned case was established to track the Company's PGA factors to be reviewed in its 2007-2008 Actual Cost Adjustment (ACA) filing. Case Nos. GR-2005-0203, GR-2006-0288 and GR-2008-0140 were established to track the Company's PGA factors to be reviewed in its 2004-2005, 2005-2006, and 2006-2007 ACA filings respectively.

3. For reasons explained in Staff's Memorandum, attached hereto as Appendix A and herein incorporated by reference, the PGA factor rate change should be approved on an interim, subject to refund status pending final Commission decisions in ACA Case Nos. GR-2005-0203, GR-2006-0288 and GR-2008-0140 and GR-2008-0387.

WHEREFORE, for the reasons stated in Staff's Memorandum, the Staff respectfully requests that the Commission issue an order approving Laclede's tariff in file no. YG-2009-0310, on an interim subject to refund basis.

Respectfully submitted,

**/s/Robert S. Berlin**

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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 all counsel of record this 10<sup>th</sup> day of November 2008.

**/s/ Robert S. Berlin**



## MEMORANDUM

TO: Missouri Public Service Commission Official Case File,  
Case No. GR-2008-0387, File No. JG-2009-0310  
Laclede Gas Company

FROM: Thomas M. Imhoff, Energy Department – Tariffs/Rate Design

/s/ Thomas M. Imhoff 11/10/08                      /s/ Robert S. Berlin 11/10/08  
Utility Operations Division/Date                      General Counsel's Office/Date

SUBJECT: Staff Recommendation on Laclede Gas Company's Scheduled Winter Season PGA Filing Effective November 17, 2008

DATE: November 10, 2008

On October 31, 2008, Laclede Gas Company (Laclede or Company) of St. Louis, Missouri filed a tariff sheet proposed to become effective November 16, 2008. The tariff sheet was filed to reflect scheduled changes in Laclede's PGA factors as the result of an estimated change in the cost of natural gas for the upcoming winter season and changes in the Actual Cost Adjustment (ACA) factor. Laclede's winter season is from November through April. All other gas companies have a five month winter season, November through March. The impact on a customer's bill is based on Laclede's six month winter season.

The effects of these changes from this filing will reduce the PGA rate filed by Laclede on June 5, 2008 from \$1.06994 per therm to \$0.83163 per therm. The PGA rate for the 2007-2008 winter season was \$0.85453 per therm. Based on Laclede's average winter usage, a Residential customer's bill is expected to be approximately \$18 less than last year, or an approximate 2% decrease.

Case No. GR-2008-0387, under which these changes were filed, was established to track the Company's PGA factors to be reviewed in its 2007-2008 ACA filing. Case Nos. GR-2005-0203, GR-2006-0288 and GR-2008-0140 were established to track the Company's PGA factors to be reviewed in its 2004-2005, 2005-2006, and 2006-2007 ACA filings, respectively. This rate change should be on an interim, subject to refund status pending final Commission decisions in ACA Case Nos. GR-2005-0203, GR-2006-0288, GR-2008-0140 and GR-2008-0387.

Due to the limited time available to review the documentation supporting the ACA factor represented in this filing, the Procurement Analysis Department (PAD) has requested permission to submit its results and recommendations regarding the information included in this ACA filing to the Commission on or before December 31, 2009.

Staff has verified that the Company has filed its 2007 annual report and is not delinquent on any of its assessments. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

The Staff has reviewed this PGA filing and has determined that it was calculated in conformance with Laclede's PGA Clause. Staff is of the opinion that good cause for approval of these tariff sheets on less than thirty days notice is demonstrated by Laclede's Commission approved PGA clause allowing for ten (10) business days notice for PGA change filings.

Therefore, Staff recommends that the following tariff sheet, filed on October 31, 2008, be approved, interim subject to refund:

P.S.C. MO. No.5 Consolidated

Two Hundred and Twelfth Revised Sheet No. 29, Cancelling Two Hundred and Thirteenth Revised Sheet No. 29