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

In the Matter of Laclede Gas Company's )	
Filing of Revised Tariffs to Increase its Annual )	Case No. GR-2013-0171
Revenues for Natural Gas	

## STAFF MOTION FOR EXTENSION OF TIME TO FILE COMMENTS REGARDING ACCURACY OF LATE-FILED EXHIBIT

**COMES NOW** the Staff ("Staff") of the Missouri Public Service Commission ("Commission"), by and through counsel, and, for its response to the Commission's November 27, 2013 *Order Granting Motion To Permit Late-Filed Exhibit And Directing Filing* ("Order"), moves the Commission grant Staff an extension of time to no later than December 30, 2013, to file its comments regarding the accuracy of the company's late-filed exhibit. In support thereof, the Staff states:

- 1. On November 22, 2013, Laclede Gas Company ("Laclede" or "Company") filed its *Motion To Permit Late Filing Of A Late-Filed Exhibit And Request For Approval Of The Late-Filed Exhibit* ("Motion"). The Company filed its Motion pursuant to the Stipulation and Agreement ("Agreement") approved by the Commission on June 26, 2013, which settled the above-captioned rate case.
- 2. Pursuant to paragraph 16 of the Agreement, the equity-debt percentages and the cost of long-term debt the Company uses for Infrastructure System Replacement Surcharge ("ISRS") purposes are to be updated following the close of Laclede's acquisition of Missouri Gas Energy ("MGE") in Case No. GM-2013-0254.
- 3. The Agreement required that the updated ISRS figures were to be submitted as a late-filed exhibit in this case within 30 days after the end of the month in which the MGE closing occurred, which date would have been October 30, 2013. For

reasons stated in its Motion, Laclede needed additional time to prepare and file its latefiled exhibit ("Late Filed Exhibit 1").

- 4. The Commission's November 27<sup>th</sup> Order granted Laclede's Motion accepting the late-filed exhibit and directed "...the parties to file comments regarding the accuracy thereof...no later than December 13, 2013."
- 5. In order for the Staff to properly evaluate the accuracy of Laclede's Late Filed Exhibit 1, the Staff has engaged in further discovery, issuing several Data Requests ("DRs"). Laclede's Responses to Staff's DRs are due December 18, 2013.
- 6. As a result of the press of year-end business around the holiday and the need for additional time for the Staff to thoroughly evaluate Laclede's responses to its DRs and for Staff to prepare informed comments on the accuracy of the financial information contained in Late Filed Exhibit 1, the Staff moves the Commission grant it an extension of time to no later than December 30, 2013, to file its comments or a status report.

WHEREFORE, for the above-stated reasons, the Staff prays the Commission grant it an extension of time to no later than December 30, 2013 to file either its comments on the accuracy of Laclede's Late Filed Exhibit 1 or a status report indicating when it will be able to file its comments.

Respectfully Submitted,

## /s/ Robert S. Berlin

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## **CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 11<sup>th</sup> day of December, 2013.

/s/ Robert S. Berlin