

MEMORANDUM

TO: Missouri Public Service Commission Official Case File,
Case No. GR-2014-0121, File No. JG-2014-0202
Laclede Gas Company

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

/s/ Thomas M. Imhoff 11/07/13
Utility Operations Division/Date

/s/ John Borgmeyer 11/07/13
Staff Counsel's Office/Date

SUBJECT: Staff Recommendation on Laclede Gas Company's Scheduled Winter Season
PGA Filing Effective November 16, 2013

DATE: November 07, 2013

On October 31, 2013, Laclede Gas Company (Laclede or Company) of St. Louis, Missouri filed a tariff sheet proposed to become effective November 16, 2013. The tariff sheet was filed to reflect scheduled changes in Laclede's Purchased Gas Adjustment (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 defines its Winter Season as November through April. All other gas companies have a five month winter season, November through March. The PGA impact on a customer's bill is during Laclede's six month winter season.

The effects of these changes from this filing will reduce the PGA rate from \$0.53589 per therm to \$0.51823 per therm. This represents a decrease of \$0.01766 per therm.

Case No. GR-2014-0121, under which these changes were filed, was established to track the Company's PGA factors to be reviewed in its 2012-2013 ACA filing. Case Nos. GR-2013-0253, GR-2012-0133, GR-2011-0055, GR-2010-0138, GR-2008-0387, GR-2008-0140, GR-2006-0288 and GR-2005-0203 were established to track the Company's PGA factors to be reviewed in its 2011-2012, 2010-2011, 2009-2010, 2008-2009, 2007-2008, 2006-2007, 2005-2006 and 2004-2005 ACA filings, respectively. This rate change should be on an interim, subject to refund status pending final Commission decisions in ACA Case Nos. GR-2014-0121, GR-2013-0253, GR-2012-0133, GR-2011-0055, GR-2010-0138, GR-2008-0387, GR-2008-0140, GR-2006-0288 and GR-2005-0203.

Due to the limited time available to review the documentation supporting the ACA factor represented in this filing, the Procurement Analysis Unit (PAU) has requested permission to submit its results and recommendations regarding the information included in this ACA filing to the Commission on or before December 19, 2014.

The Energy Unit – Tariffs/Rate Design Staff (Staff) has verified that the Company has filed its annual report and is not delinquent on any of its assessment. 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, 2013 be approved, interim, subject to refund:

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

Two Hundred and Nineteenth Revised Sheet No. 29, Cancelling Two Hundred and Eighteenth Revised Sheet No. 29

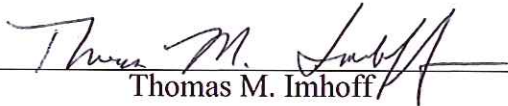
**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Laclede Gas)
Company's Scheduled November PGA)
Filing) Case No. GR-2014-0121

AFFIDAVIT OF THOMAS M. IMHOFF

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Thomas M. Imhoff, of lawful age, on oath states: that he participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was provided to him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief.


Thomas M. Imhoff

Subscribed and sworn to before me this 7th day of November, 2013.

LAURA BLOCH Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: June 21, 2015 Commission Number: 11203914
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Notary Public