

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

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

**Case No. GR-2015-0201**

**STAFF REPLY TO LACLEDE GAS COMPANY'S  
RESPONSE TO STAFF'S RECOMMENDATION AND MEMORANDUM**

**COMES NOW** the Staff of the Missouri Public Service Commission and replies as follows to the *Response to Staff's Recommendation and Memorandum Regarding Laclede Gas Company's 2014-2015 Actual Cost Adjustment Filing* filed herein by Laclede Gas Company ("Laclede" or "Company"):

1. Staff filed its Actual Cost Adjustment ("ACA") Recommendation in this case concerning Laclede's 2014-2015 ACA filing on December 16, 2016. In its ACA Recommendation, Staff recommended the Commission hold this case open so that Staff can further investigate Laclede's compliance with the gas supply documentation requirements of Laclede's CAM and Standards of Conduct, as discussed in the "Gas Supply and Transportation Standards of Conduct" subsection of the Staff Recommendation Memorandum, and make further recommendations as necessary. In its ACA Recommendation Staff also requested the Commission order Laclede to respond to certain other comments, concerns and recommendations contained therein.

2. Laclede filed its *Response to Staff's Recommendation and Memorandum Regarding Laclede Gas Company's 2014-2015 Actual Cost Adjustment Filing* ("Response") on January 30, 2017. On January 31, 2017, the Commission issued an *Order Directing Staff to Reply* ("Order") to Laclede's Response no later than February 16, 2017.

3. Staff's Procurement Analysis Unit has reviewed the Company's Response and prepared the attached Memorandum, which is incorporated herein by reference. As reflected in the attached Memorandum, Staff does not agree with all statements made in Laclede's Response and has concerns with certain aspects of Laclede's responses to portions of the Staff Recommendation. These items are discussed in greater detail in the attached Memorandum. It should be noted that Staff does not necessarily agree with, or acquiesce in, other comments in Laclede's Response not specifically addressed herein or in the attached Memorandum.

4. Staff recommends the Commission not establish the final balances for Laclede's 2014-2015 ACA at this time and recommends this case remain open pending resolution of items as set forth in Staff's ACA Recommendation and in the attached Memorandum. Staff also recommends the Commission issue an order as set forth in the attached Memorandum.

**WHEREFORE**, Staff submits the attached Memorandum in Reply to Laclede's *Response to Staff's Recommendation and Memorandum Regarding Laclede Gas Company's 2014-2015 Actual Cost Adjustment Filing* and requests that this case remain open<sup>1</sup> and that the Commission issue an order (1) directing Laclede to provide a supplemental response by May 15, 2017, as described in the attached Memorandum and (2) opening an investigatory docket as also described in the attached Memorandum.

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<sup>1</sup> The ACA account balances should not be finalized at this time.

Respectfully submitted,

**/s/ Jeffrey A. Keevil**

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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 counsel of record this 16<sup>th</sup> day of February, 2017.

**/s/ Jeffrey A. Keevil**