

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

In the Matter of Missouri Gas        )        **Case No. GR-2015-0203**  
Energy's (Laclede) PGA Filing    )        Tracking No. YG-2016-0110

**STAFF RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through counsel, and for its recommendation in this matter hereby respectfully states:

1. On October 28, 2015, Missouri Gas Energy ("MGE" or "Company"), an operating unit of Laclede Gas Company, filed a tariff sheet to reflect changes in its Purchased Gas Adjustment (PGA) factors as a result of estimated changes in the cost of natural gas for the upcoming season and changes in the Company's Actual Cost Adjustment (ACA) factors. The tariff sheet bears a proposed effective date of November 13, 2015. Also on October 28, 2015, MGE filed an Application for Variance and Motion for Expedited Treatment to allow the rate change to go into effect November 6, 2015, or as soon thereafter as reasonably practical.

2. The filing will decrease the firm sales PGA factor to \$0.46224 per one-hundred cubic feet (Ccf), from the current PGA factor of \$0.53209 per Ccf. This represents a decrease of \$0.06985 per Ccf.

3. The Company's filing also reflects adjustments to the Company's ACA factors. Staff's Procurement Analysis Unit (PAU) will review the Company's ACA filing and may recommend adjustments to the ACA account balance(s). Due to the limited time available to review the documentation supporting the ACA factors represented in this filing, the 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 16, 2016.

4. Case No. GR-2015-0203, under which these changes were filed, was established to track the Company's PGA factors to be reviewed in its 2014-2015 ACA filing. Case No. GR-2014-0324 was established to track the Company's PGA factors to be reviewed in its 2013-2014 ACA filing. As explained in Staff's *Memorandum*, attached hereto and incorporated herein by reference, Staff recommends the Commission approve the tariff sheet on an interim, subject to refund status pending final Commission decisions in ACA Case Nos. GR-2015-0203 and GR-2014-0324.

5. Staff also recommends the Commission order PAU Staff to file the results of its review of the ACA factors represented in this filing no later than December 16, 2016.

6. Staff has verified that the Company has filed its annual report, and is not delinquent on its PSC assessment. Staff is not aware of any other matters before the Commission that affects or is affected by this filing, other than those mentioned above.

7. Staff is of the opinion that good cause for approval of the tariff sheet on less than thirty (30) days' notice is demonstrated by MGE's Commission-approved PGA clause allowing for ten (10) business days' notice for PGA change filings.

**WHEREFORE**, Staff recommends the Commission grant the Company's request for a one-time variance from its PGA tariff and approve the following tariff sheet to become effective on November 6, 2015, or as soon thereafter as reasonably practical, on an interim basis, subject to refund, and that the Commission order PAU Staff to file the results of its ACA review in this docket no later than December 16, 2016:

Respectfully submitted,

**/s/ Jeffrey A. Keevil**

Jeffrey A. Keevil

Missouri Bar No. 33825

Attorney for the Staff of the

Missouri Public Service

Commission

P. O. Box 360

Jefferson City, MO 65102

(573) 526-4887 (Telephone)

(573) 751-9285 (Fax)

Email: jeff.keevil@psc.mo.gov

**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 3<sup>rd</sup> day of November, 2015.

**/s/ Jeffrey A. Keevil**

## MEMORANDUM

TO: Missouri Public Service Commission Official Case File,  
Case No. GR-2015-0203, Tracking No. YG-2016-0110  
Missouri Gas Energy

FROM: Michelle A. Bocklage, Tariff/Rate Design Department, Operational Analysis  
Division

/s/ Thomas M. Imhoff 11/3/2015      /s/ Jeffrey A. Keevil 11/3/2015  
Operational Analysis Division      Staff Counsel Division

SUBJECT: Staff Recommendation for Missouri Gas Energy's Scheduled Winter PGA  
Filing Effective: November 6, 2015 and Request For Expedited Treatment

DATE: November 3, 2015

On October 28, 2015, Missouri Gas Energy (MGE or Company), an operating unit of Laclede Gas Company, filed a tariff sheet bearing an effective date of November 13, 2015. This tariff sheet was filed to reflect a change in MGE's Purchased Gas Adjustment (PGA) factor as a result of estimated changes in the cost of natural gas for the 2014-2015 winter heating season and changes in the Company's ACA factor.

This filing will decrease the firm sales PGA factor to \$0.46224 per one-hundred cubic feet (Ccf), from the current PGA factor of \$0.53209 per Ccf. This represents a decrease of \$0.06985 per Ccf.

Case No. GR-2015-0203, under which these changes were filed, was established to track the Company's PGA factors to be reviewed in its 2014-2015 Actual Cost Adjustment (ACA) filing. ACA filing Case No. GR-2014-0324 was established to track the Company's PGA factors to be reviewed in its 2013-2014 ACA filing. This rate change should be implemented on an interim, subject to refund status pending final Commission decisions in ACA Case Nos. GR-2015-0203 and GR-2014-0324.

MGE requests a one-time variance from its PGA tariff and expedited treatment to allow the rate decrease to go into effect by November 6, 2015, or as soon thereafter as reasonably practical.

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 16, 2016.

Staff has verified that this company has filed its 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, other than as mentioned above.

The Energy Tariffs/Rate Design Staff (Staff) is of the opinion that good cause for approval of this tariff sheet on less than thirty (30) days' notice is demonstrated by MGE's Commission-approved PGA Clause allowing for ten (10) business days' notice for PGA change filings.

Staff recommends that the filing and request for a one time variance from its PGA tariff and expedited treatment be approved to become effective on November 6, 2015, or as soon thereafter as reasonably practical, and that the following tariff sheet, filed on October 28, 2015, be approved, interim subject to refund:

P.S.C. MO. No.6

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Fourth Revised SHEET No. 24.3, Cancelling Third Revised SHEET No. 24.3

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

In the Matter of Missouri Gas Energy's     )  
(Laclede) PGA Filing                             )

Case No. GR-2015-0203

**AFFIDAVIT OF MICHELLE A. BOCKLAGE**

State of Missouri     )  
                                   ) ss.  
County of Cole        )

**AFFIDAVIT**

**COMES NOW** Michelle A. Bocklage and on her oath declares that she is of sound mind and lawful age; that she contributed to the attached Staff Recommendation and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

  
Michelle A. Bocklage

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 3<sup>rd</sup> day of November, 2015.

  
NOTARY PUBLIC

