

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

In the Matter of the PGA Filing of)
Spire Missouri, Inc., f/k/a Laclede Gas Company) **Case No. GR-2016-0224**

**STAFF SUPPLEMENTAL REPLY TO SPIRE MISSOURI INC.'S
RESPONSE TO STAFF'S RECOMMENDATION AND MEMORANDUM**

COMES NOW the Staff of the Missouri Public Service Commission and offers its *Supplemental Reply* as follows to the *Response to Staff's Recommendation and Memorandum Regarding Laclede Gas Company's 2015-2016 Actual Cost Adjustment Filing* filed herein by Spire Missouri Inc. ("Spire Missouri" or "Company"):

1. Staff filed its Actual Cost Adjustment ("ACA") Recommendation in this case concerning Spire Missouri's eastern Missouri service territory's ("Spire Missouri East") (f/k/a Laclede Gas Corporation) 2015-2016 ACA filing on December 18, 2017. In its ACA Recommendation, Staff recommended the Commission hold this case open pending resolution of Staff's investigation of Spire Missouri's compliance with the requirements of the CAM and Standards of Conduct in Case No. GO-2017-0223 and resolution of all prior Spire Missouri East ACA cases that remain open and reduce total gas costs by \$114,273. In its ACA Recommendation Staff also requested the Commission order Laclede to respond to certain other comments, concerns and recommendations contained therein.

2. Spire Missouri filed its *Response to Staff's Recommendation and Memorandum Regarding Laclede Gas Company's 2015-2016 Actual Cost Adjustment Filing* ("Response") on February 1, 2018, stating that the reduction of gas costs recommended by Staff to account for an off-system sales error was unnecessary.

In addition, Spire Missouri states that it provided initial workpapers to Staff showing that it made an adjustment in May 2016 already accounting for the error.

3. On March 16, 2018, Staff requested an extension until April 18, 2018, to complete its investigation and file a *Supplemental Reply*. The Commission approved Staff's request on March 19, 2018.

4. Staff's Procurement Analysis Unit has reviewed additional supporting documentation provided by the Company, and held a conference call on April 16, 2018, where the Company provided further explanation, showing that Spire Missouri corrected a prior period error in its Off-System Sales margin. With the additional details provided by Spire Missouri, Staff has determined the following preliminary ACA account balances shown in the table below to reflect the under or (over)-recovery balances as of September 30, 2016.

	Firm Sales non-LVTSS	Firm Sales LVTSS	Interruptible Sales	LP Sales	Firm Transportation	Basic Transportation	Vehicular Fuel
ACA Balance per Filing	\$ 32,393,843	\$83,815	\$ (9,406)	\$2,644	\$ 489,091	\$ 241	\$623,343
Staff Adjustments	\$ 0	\$ 0	\$0	\$0	\$ 0	\$0	\$ 0
Staff Recommended ACA Balance	\$ 32,393,843	\$83,815	\$ (9,406)	\$2,644	\$ 489,091	\$ 241	\$623,343

An over-recovery is the amount owed to the customers by the Company and is shown in the table as a negative number. An under-recovery is an amount owed to the Company by the customers and is shown in the table as a positive number.

5. However, Staff continues to recommends the Commission hold this case open pending a resolution of Staff's investigation in Case No. GO-2017-0223, and resolution of all prior Spire Missouri East ACA cases that remain open.

WHEREFORE, Staff submits its *Supplemental Reply to Spire Missouri's Response to Staff's Recommendation and Memorandum Regarding Laclede Gas*

Company's 2015-2016 Actual Cost Adjustment Filing and requests that this case remain open¹ pending resolution of Staff's investigation of Spire in Case No. GO-2017-0223 and resolution of all prior Spire Missouri East ACA cases that remain open.

Respectfully Submitted,

/s/ Mark Johnson

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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 18th day of April 18, 2018.

/s/ Mark Johnson

¹ The ACA account balances should not be finalized at this time.