

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

In the Matter of Laclede Gas Company's)
2010-2011 Actual Cost Adjustment Filing)

Case No. GR-2012-0133

**REQUEST FOR EXTENSION OF TIME TO FILE REPLY
AND MOTION FOR EXPEDITED TREATMENT**

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission"), through the undersigned counsel, and for its Request for Extension of Time to File Reply and Motion for Expedited Treatment respectfully states as follows:

1. This case concerns Laclede Gas Company's ("Laclede") 2010-2011 ACA filing. Staff filed its Recommendation in this case on December 14, 2012, in which it requested that Laclede be given 45 days to respond to the Staff Recommendation. By Order issued on December 26, 2012, Laclede was ordered to file its response by February 11, 2013.

2. On February 11 Laclede filed its response as ordered in this case. Also on February 11, in Case No. GR-2012-0077, Ameren Missouri ("Ameren") filed its response to Staff's Recommendation regarding Ameren's 2010-2011 ACA period. In the Ameren case, Case No. GR-2012-0077, on the same day that Ameren filed its response the Commission issued an *Order Directing Staff to Reply* to Ameren's response **no later than March 11, 2013**.

3. By filing this Request for Extension of Time to File Reply and Motion for Expedited Treatment Staff is requesting that it be given the same amount of time to prepare and file its reply to Laclede in this case as it has been given to prepare and file its reply to Ameren in Case No. GR-2012-0077, *i.e.*, until March 11, 2013. Without an Order granting Staff until March 11 to file its reply, pursuant to Commission rule 4 CSR

240-2.080(13) Staff would only have 10 days after Laclede filed its response in which to file a reply, *i.e.*, February 21, 2013.

4. Staff would note that from the time it filed its Staff Recommendation until Laclede filed its response, Laclede had almost two months to prepare and file its response. Given the length and complexity of Laclede's response, as well as Staff's workload in other cases, Staff believes that allowing it 28 days to prepare and file its reply – as the Commission has already ordered *sua sponte* in the Ameren case – is reasonable and warranted. In addition to this case, Staff counsel is currently scheduled to be in the hearing on The Empire District Electric Company's rate increase request on various days from February 19 through March 4 and is also involved in Laclede's general rate increase request case, as well as several other ACA cases at the present time. The Staff's Procurement Analysis Unit is currently involved in discussions with Laclede regarding five prior ACA cases and one complaint case and is also involved in the Laclede general rate increase case, the Laclede/MGE acquisition case, at least two Ameren ACA cases and one MGE ACA case. Allowing Staff until March 11 to file its reply will therefore prevent further conflict with Staff's other significant workload.

5. Granting Staff's request herein on an expedited basis will cause no negative effect, since, as stated in Staff's Recommendation filed herein, there are several prior Laclede ACA cases currently open and pending before the Commission. Until the final ACA balances are established for those prior ACA periods, the ACA balance for this period should not be finalized because the prior period ending balances become the beginning balances for subsequent periods. Furthermore, this request is being filed as soon as it could have been, given that Tuesday (the day after Laclede

filed its response) was a state holiday. Staff requests that the Commission grant Staff's request as soon as possible and in any event no later than February 20, 2013.

6. Finally, Staff counsel has been in contact with counsel for Laclede and the Office of the Public Counsel and both have indicated that they have no objection to the Commission granting Staff's request herein.

WHEREFORE, Staff requests that the Commission issue an order as soon as possible but in any event by February 20, 2013, granting Staff until March 11, 2013 to file its reply to Laclede's response in this case.

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 all counsel of record this 14th day of February, 2013.

/s/ Jeffrey A. Keevil