



4. Laclede-MGE's Commission-approved PGA clause allows for ten business days' notice for filings to change its PGA factor, and therefore good cause exists for approval of this tariff sheet on less than 30 days' notice.

**WHEREFORE**, Staff respectfully recommends the following tariff sheet filed on October 17, 2013, with an effective date of November 1, 2013, be approved on an interim basis, subject to refund:

P.S.C. MO. No. 6

Original Sheet No. 24.3, Laclede Gas Company, All Missouri Gas Energy Service Areas, Cancelling P.S.C. MO No. 1, 28<sup>th</sup> Revised Sheet No. 24.3, Missouri Gas Energy, a Division of Southern Union Company, All Missouri Service Areas.

Respectfully Submitted,

/s/ John D. Borgmeyer

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**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 24<sup>th</sup> day of October, 2013.

/s/ John D. Borgmeyer

**MEMORANDUM**

TO: Missouri Public Service Commission Official Case File,  
Case No. GR-2013-0422, File No. YG-2014-0182  
Laclede Gas Company - Missouri Gas Energy Operating Division

FROM: Henry E. Warren, Tariff, Safety, Economic and Engineering Analysis Department,  
Energy Unit – Tariffs/Rate Design

/s/ Thomas M. Imhoff 10/24/13                      /s/ John Borgmeyer 10/24/13  
Regulatory Review Division/Date                      Staff Counsel Division/Date

SUBJECT: Staff Recommendation for Laclede Gas Company - Missouri Gas Energy Operating  
Division's Winter PGA Filing - Effective November 1, 2013

DATE: October 24, 2013

On October 17, 2013, Laclede Gas Company - Missouri Gas Energy Operating Division (Laclede-MGE or Company), of St. Louis, Missouri, filed a tariff sheet bearing an effective date of November 1, 2013, for all MGE Service Areas. This tariff sheet was filed to reflect a change in the Laclede-MGE Purchased Gas Adjustment (PGA) factor as a result of estimated changes in the cost of natural gas for the 2013-2014 heating season. On October 23, 2013, Laclede-MGE filed a substitute tariff sheet correcting an error in the sheet designation.

This filing, as substituted, will decrease the firm PGA factor for the 2013-2014 heating season to \$0.55962 per one-hundred cubic feet (Ccf), from the current PGA factor of \$0.56529 per Ccf. This represents a decrease of \$0.00567 per Ccf.

Case No. GR-2013-0422, under which these changes were filed, was established to track the Laclede-MGE PGA factors to be reviewed in its 2012-2013 Actual Cost Adjustment (ACA) filing. This rate change should be on an interim, subject to refund status pending final Commission decisions in ACA Case No. GR-2013-0422.

Due to the limited time available to review the documentation supporting the ACA factor represented in this filing, the Procurement Analysis Department (PAD) 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.

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

Although Laclede-MGE filed its tariff sheet, as substituted, with a requested effective date of November 1, 2013, the Commission may approve the sheet, as substituted, and order an earlier effective date. Staff recommends that the following tariff sheet filed on October 17, 2013, as substituted on October 23, 2013, be approved to become effective on November 1, 2013, be approved, interim subject to refund:

P.S.C. MO. No.6, Original SHEET No. 24.3, Laclede Gas Company, All Missouri Gas Energy Service Areas Canceling P.S.C. MO No. 1, Twenty-Eighth Revised SHEET No. 24.3, Missouri Gas Energy, a Division of Southern Union Company, All Missouri Service Areas.

Attachment A

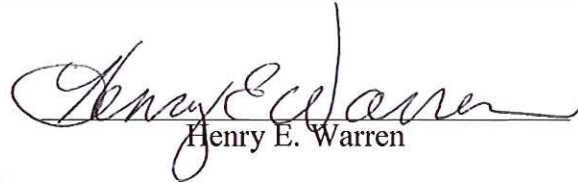
**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of the Application of Missouri     )  
Gas Energy for a PGA Tariff Revision.         )     Case No. GR-2013-0422

**AFFIDAVIT OF HENRY E. WARREN**

STATE OF MISSOURI     )  
                                  ) ss  
COUNTY OF COLE     )

Henry E. Warren, 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.

  
Henry E. Warren

Subscribed and sworn to before me this 23<sup>rd</sup> day of October, 2013.

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

  
Notary Public