

4. Reviewing the work papers supporting any PGA filing – particularly those of the two largest LDCs in the state – is a detailed, time-consuming effort for the Staff's Energy Tariff/Rate Design Unit. Even in the absence of a request for expedited treatment, under a typical PGA change filing which allows for ten (10) business days' notice it is often a challenge to get a recommendation to the Commission in time for the Commission to place the matter on its agenda and vote out an order. Furthermore, this tariff filing also includes changes to the Company's Actual Cost Adjustment ("ACA") factors, which affect the PGA calculations. In addition, Staff did not receive the work papers from Laclede until approximately 5:45 pm on October 28. Finally, the foregoing does not even give consideration to the press of other business facing Staff's Energy Tariff/Rate Design Unit.

5. Based on the above, Staff needs more time to file a recommendation on the pending tariff sheet than October 30, 2015. Staff will endeavor to file its recommendation as soon as possible and in any event in time for the tariff to be processed prior to the effective date stated on the tariff.

WHEREFORE, Staff respectfully states that it needs more time to file a recommendation on the pending tariff sheet than provided in the Order issued October 28, 2015, and that it will file such recommendation as soon as possible and in any event in time for the tariff to be processed prior to the effective date stated on the tariff.

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 30th day of October, 2015.

/s/ Jeffrey A. Keevil