

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

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

STAFF RESPONSE TO ORDER DIRECTING FILING

COMES NOW the Staff of the Missouri Public Service Commission and for its response to the *Order Directing Expedited Filing of Recommendation* issued herein on October 28, 2015, states as follows:

1. On October 28, 2015, in Case No. GR-2015-0203, Missouri Gas Energy ("MGE") – an operating unit of Laclede Gas Company ("Laclede"), and the second-largest natural gas local distribution company in the state – filed a PGA tariff sheet bearing an effective date of November 13, 2015. Also on October 28, MGE filed a Verified Application for Variance and Motion for Expedited Treatment in which MGE requested that the tariff be made effective November 6, 2015.

2. On October 28, 2015, in Case No. GR-2015-0201, Laclede – the largest natural gas local distribution company in the state – also filed a PGA tariff sheet bearing an effective date of November 13, 2015. Also on October 28, Laclede filed an Application for Variance and Request for Expedited Treatment in which Laclede requested that the tariff be made effective November 6, 2015.

3. In response to MGE's filing in Case No. GR-2015-0203, the Commission issued, by delegation of authority, an *Order Directing Expedited Filing of Recommendation* ("Order") on October 28, 2015, which ordered that "No later than October 30, 2015, the Commission's staff shall file **either** a recommendation on the pending tariff sheet **or a statement that Staff needs more time.**" (emphasis added)

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 complete work papers supporting the MGE filing 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

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 30th day of October, 2015.

/s/ Jeffrey A. Keevil