BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the matter of Fidelity Natural Gas Co.,)	
Inc., purchased gas adjustment (PGA) to)	
be audited in its 2004-2005 Actual Cost)	Case No. GR-2006-0170
Adjustment.)	

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and for its recommendation in the PGA filing of Fidelity Natural Gas Co., Inc., states:

- 1. On October 14, 2005, Fidelity Natural Gas, Inc. (Fidelity or Company) of Sullivan, Missouri, filed a tariff sheet proposed to become effective November 1, 2005. On October 24, 2005, Fidelity filed a substitute tariff sheet to correct typographical errors in the previously filed sheet.
- 2. Staff's review of the Company's pipeline capacity shows that the level of contracted pipeline capacity for this period did not change from the previous ACA period.
- 3. Staff's review of Fidelity's capacity and peak day plans showed that reserve margin is not an issue.
- 4. Laclede Gas Company purchased the Company in February of this year. On February 28, 2006, Laclede was granted a certificate of convenience and necessity to provide natural gas service to this service area. Staff has a recommendation in this case, but is not suggesting any adjustment. Staff's Recommendation is attached hereto as Appendix A, both HC and NP versions.

WHEREFORE the Staff recommends that the Commission accept Staff's recommendation and issue an order consistent with Staff's Recommendations in this case.

Respectfully submitted,

/s/ Lera L. Shemwell

Lera L. Shemwell Deputy General Counsel Missouri Bar No. 43792

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 21st day of December, 2006.

/s/ Lera L. Shemwell

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the matter of Fidelity Natural Gas, Inc.'s) Purchased Gas Adjustment (PGA) Factors to be) Case No. GR-2006-0170 audited in its 2004-2005 Actual Cost Adjustment)				
AFFIDAVIT OF DAVID M. SOMMERER				
STATE OF MISSOURI)) ss. COUNTY OF COLE)				
David Sommerer, of lawful age, on his oath states: that he has participated in the preparation of the following Staff Memorandum; that the information is given by him; that he has knowledge of the matters set forth; and that such matters are true and correct to the best of his knowledge and belief. David M. Sommerer				
Subscribed and sworn to before me this Aday of MCMAC 2006. TONI M. CHARLTON Notary Public - State of Missouri My Commission Expires December 28, 2008 Cole County Commission #04474301				

MEMORANDUM

TO: Missouri Public Service Commission Official Case File

Case No. GR-2006-0170, Fidelity Natural Gas, Inc.

FROM: David M. Sommerer, Manager - Procurement Analysis Department

Phil S. Lock, Regulatory Auditor - Procurement Analysis Department

Lesa A. Jenkins, P.E., Regulatory Engineer - Procurement Analysis Department Kwang Choe, Ph.D., Regulatory Economist - Procurement Analysis Department

/s/ Dave Sommerer 12/21/06 /s/ Lera Shemwell 12/21/06

Project Coordinator / Date General Counsel's Office / Date

SUBJECT: Staff Recommendation for Fidelity Natural Gas, Inc.'s 2004-2005 Actual Cost

Adjustment Filing

DATE: December 21, 2006

The Procurement Analysis Department (Staff) has reviewed Fidelity Natural Gas, Inc.'s (Fidelity or Company) 2004-2005 Actual Cost Adjustment (ACA) filing. This filing was made on October 14, 2005, for rates to become effective November 1, 2005, and was docketed as Case No. GR-2006-0170. The audit consisted of an analysis of the billed revenues and actual gas costs for the period of September 1, 2004, to August 31, 2005, included in the Company's computation of the ACA rate. FNG provided natural gas to a maximum of 1,338 sales customers in the counties of Franklin and Crawford, which include the City of Sullivan, Oak Grove Village and the unincorporated areas of Crawford County. The ACA ending balance in the Company's 2004-2005 ACA filing is a \$24,646 over-recovery.

Because of internal resource limitations, Staff conducted no reliability review for this ACA period. Staff's review of the Company 2004-2005 capacity shows that the level of contracted pipeline capacity for this period did not change from the previous ACA period. Staff's review of Fidelity's capacity and peak day plans in the 2002-2003 ACA, Case No. GR-2003-0323, showed that reserve margin was not an issue in the 2003-2004 ACA or 2004-2005 ACA.

The Missouri Public Service Commission (Commission) issued an Order on February 21, 2006 in Case GM-2006-0183, with an effective date of February 28, 2006, in which the Laclede Gas Company (Laclede) was granted a certificate of convenience and necessity to provide natural gas service as a gas corporation and public utility, subject to the jurisdiction of the Commission, in the service areas previously served by Fidelity. The Commission approved Laclede's ownership of Fidelity effective February 28, 2006. Although the Laclede purchase of Fidelity occurred outside of the 2004/2005 ACA period, Staff's recommendations in the 2004/2005 ACA are being

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made after Laclede began operations of this service area. Thus, any recommendations in this 2004/2005 ACA case, (GR-2006-0170), applicable to Fidelity may also impact Laclede.

HEDGING
**
** for each of the months of November 2004 to March 2005, respectively.
The Company needs to carefully evaluate the price movements and update its hedging (gas procurement) plan for each ACA period as the gas market continues to develop, as it appears that the Company factors this in when determining the **** as well as in executing hedging transactions. Nonetheless, the Company should employ disciplined as well as discretionary approaches in its hedging strategy. The concern here is that if the Company chooses to delay initial hedging until later in the summer and then chooses to further delay or defer hedge placement pending hurricane or other market disturbances, undue exposure to market pricing can result.
Staff expects that Laclede will ultimately be doing the gas buying, and that Laclede's practices will be used to purchase gas for this service area.

NP

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RECOMMENDATION

1. The Staff has proposed no adjustments in Case No. GR-2006-0170 for Fidelity Natural Gas, Inc. Staff therefore recommends that the Commission issue an order requiring Fidelity to accept the ending (over)/under recovery balances from the following table:

Description	8-31-05 Ending Balances Per Filing	Staff Adjustments 2004-2005 ACA	8-31-05 Ending Balances Per Staff
2003-2004 ACA	\$107,712 (A)	\$0	\$107,712
Ending Balance			
Cost of Gas	\$1,476,631	\$0	\$1,476,631
Cost of	\$348,618	\$0	\$348,618
Transportation			
Revenues	(\$1,957,671)	\$0	(\$1,957,671)
ACA Approach for	\$64	\$0	\$64
Interest Calculation			
Refunds	\$0	\$0	\$0
Take or Pay	\$0	\$0	\$0
Total(Over)/Under Recovery	(\$24,646)	\$0	(\$24,646)

⁽A) Per Report & Order in GR-2004-0466, effective May 27, 2005.

^{2.} Respond to recommendations included herein within 30 days.