

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

In the Matter of Laclede Gas Company's)
2008 PGA Filing.)

Case No. GR-2008-0387

REPLY TO LACLEDE'S RESPONSE TO STAFF STATUS REPORT

COMES NOW the Staff of the Missouri Public Service Commission (Staff) in reply to Laclede's September 13, 2011 Response to Staff's Status Report filed on August 31, 2011. In support thereof, the Staff offers its Reply to clarify the specific information the Staff needs from the Company for the 2011-2012 ACA period.

1. As Staff noted in its August 31st Status Report in this case, Staff requires the detailed workpapers, including Company explanations, for the assumptions chosen and all source data. The Status Report also noted that the Laclede analysis does not explain how its analysis considers varying weather conditions or costs.

2. Staff's August 31st Status Report suggested the Staff would look for the detailed information in Laclede's responses to Staff's data requests in the 2011-2012 ACA period:

As a part of Staff's review of Laclede information in the 2011/2012 ACA period, Staff issues data requests regarding gas supply planning and reliability. Staff anticipates that Laclede's responses will include 1) all the Company's supporting documents regarding its study for cost and volumes for baseload and swing gas supply for varying weather conditions, and 2) copies of the underlying data supporting Laclede's spreadsheet analysis. This specific information could be provided with Laclede's responses to standard staff data requests related to gas supply planning, such as DRs 7 and 11 in GR-2011-0055, the current ACA case under review.

3. Laclede's September 13, 2011 Response to Staff Status Report states it performed the study and provided the results to Staff and that the "...Excel file contained all the data

necessary to the analysis.” (para. 10, Laclede’s Response). Staff disagrees. Laclede did not provide source data, objectives, or conclusions.

4. Staff has provided an Attachment, Highly Confidential (HC), with this pleading to clarify the specific information and results missing from the Laclede one-page Excel spreadsheet that Laclede provided to Staff.

5. Staff reiterates that Laclede could provide the requested information in its responses to Staff’s data requests for the 2011-2012 ACA period. Alternatively, Laclede may file in EFIS the specific information outlined in Staff’s Attachment (HC) now as a non-case related filing because the case number has not been established for that ACA period.

WHEREFORE, for the purpose of clarifying the specific information needed by Staff from the Company, the Staff prays the Commission accept its Reply to Laclede’s Response to Staff Status Report.

Respectfully submitted,

/s/Robert S. Berlin

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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 all counsel of record this 22nd day of September 2011.

/s/ Robert S. Berlin