BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Missouri Gas Energy's)	
Filing of Revised Tariffs to Increase its Annual)	Case No. GR-2014-0007
Revenues for Natural Gas Service)	

STAFF REQUEST FOR ORDER GRANTING PARTIES TIME TO RESPOND TO SUBMISSION OF REPORT

COMES NOW the Staff of the Missouri Public Service Commission, and for its Request for Order Granting Parties Time to Respond to Submission of Report ("Request") respectfully states as follows:

- 1. On May 4, 2016, Laclede Gas Company ("Laclede"), on behalf of its operating units Missouri Gas Energy ("MGE") and Laclede Gas, filed a report on the operation and impact of various rate designs ("Report") in this case pursuant to paragraph 3 of the Stipulation and Agreement ("Stipulation") filed on April 11, 2014.
- 2. As mentioned in Laclede's cover pleading accompanying the Report, the Stipulation provided that the parties to the Stipulation would "work collaboratively to prepare and complete a report for submission to the Commission." As Laclede indicated, the parties met on multiple occasions to share, analyze, and discuss data and rate design alternatives; however, there was not sufficient time for the parties to develop consensus on the matters addressed by the Report.
- 3. Accordingly, the Report filed by Laclede² on May 4, 2016, was filed on behalf of only Laclede and MGE, and not on behalf of the other parties, as reflected in Laclede's filing. As also stated in Laclede's filing, "It is expressly understood, however,

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¹ Stipulation paragraph 3(b).

² Stipulation paragraph 3(b) also provided that "The Company shall have the responsibility to coordinate the preparation of the report."

that all Parties, including Laclede, will have an opportunity to submit supplemental or responsive comments or data as they deem appropriate."

Commission rule 4 CSR 240-2.080(13) provides that "Parties shall be 4. allowed ten (10) days from the date of filing in which to respond to any pleading unless otherwise ordered by the commission." Staff respectfully submits that due to the complexity of the subject matter, and the number of items addressed in Laclede's Report, 10 days is not sufficient time for the parties to review and respond to Laclede's May 4, 2016, filing. In addition, there are a number of other cases currently pending at the Commission which require the attention of Staff (and possibly other parties). Also, although the parties had discussed many issues regarding the Report, the first time Staff saw the Report itself³ was when it was filed by Laclede. Staff appreciates Laclede filing the Report, and does not intend for this Request to be interpreted as criticism of Laclede's filing of the Report. In fact, when it became clear that there would not be enough time for the parties to develop consensus on the matters addressed by the Report, Staff suggested that Laclede file the Report on behalf of Laclede/MGE only. However, for the reasons stated above Staff requests the Commission issue an order granting all parties (not just Staff) thirty (30) days to respond to the Report filed by Laclede.

WHEREFORE, Staff respectfully requests that the Commission issue an order granting all parties thirty (30) days to respond to Laclede's Report.

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³ Staff had seen Exhibit 1 prior to the Report being filed.

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 4th day of May, 2016.

/s/ Jeffrey A. Keevil