BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of the Verified Application and Petition of Laclede Gas Company to Change Its Infrastructure System Replacement Surcharge In its Laclede Gas Service Territory

File No. GR-2015-0026 Tariff No. YG-2015-0027

STAFF RECOMMENDATION TO APPROVE TARIFF SHEET AND TO GRANT MOTION FOR EXPEDITED TREATMENT

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Recommendation* in this matter hereby respectfully states:

1. On September 30, Staff filed its Amended Staff Recommendation, recommending the Commission approve a revenue requirement for Laclede Gas Company's ("Laclede") Infrastructure System Replacement Surcharge (ISRS) in this matter.

2. On October 6, Laclede filed a Unanimous Stipulation and Agreement and Tariff Revision. This agreement stipulated that two work orders related to certain telemetry equipment should be removed from the ISRS revenue requirement in this matter. The agreement included a tariff sheet reflecting a revenue requirement consistent with Staff's Amended Recommendation, adjusted to remove the two telemetry work orders.

3. As explained in the Staff's Recommendation, attached here as Appendix A and incorporated by reference, Staff has reviewed the tariff sheet and found that it complies with Staff's September 30 Amended Recommendation. Staff does not object to Laclede's requested expedited treatment to allow the tariff to go into effect on October 18, 2014.

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WHEREFORE, Staff recommends the Commission issue an order to allow the

following tariff sheet, as filed on October 6, 2014, to go into effect October 18, 2014, as

requested by Laclede:

P.S.C. MO. No. 5

Twenty-Third Revised Sheet No. 12, CANCELLING Twenty-Second Revised Sheet No. 12

Respectfully Submitted,

STAFF OF THE MISSOURI PUBLIC SERVICE COMMISSION

/s/ John D. Borgmeyer

John D. Borgmeyer Deputy Legal Counsel Missouri Bar No. 61992

Attorney for the Staff of the Missouri Public Service Commission P.O. Box 360 Jefferson City, Missouri 65102 Telephone: (573) 751-5472 Fax: (573) 751-9285 Email: john.borgmeyer@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 14th day of October, 2014.

/s/ John D. Borgmeyer

MEMORANDUM

- TO: Missouri Public Service Commission Official Case File, Case No. GR-2015-0026, File No. YG-2015-0145, Laclede Gas Company
- FROM: Thomas M. Imhoff, Energy Tariffs / Rate Design

/s/ Thomas M Imhoff10-14-14/s/ John Borgmeyer 10-14-14Energy Department/DateStaff Counsel's Office/Date

- SUBJECT: Staff Report and Recommendation Regarding Laclede Gas Company's RESPONSE TO STAFF'S AMENDED RECOMMENDATION AND MOTION FOR EXPEDITED TREATMENT in order to Change its Infrastructure System Replacement Surcharge and Subsequent "Compliance" Filing
- DATE: October 14, 2014

BACKGROUND

On September 30, 2014, the Missouri Public Service Commission ("Commission") issued an ORDER SETTING DEADLINE FOR RESPONSE TO STAFF'S AMENDED RECOMMENDATION ("Order"). The Order set an October 7, 2014 deadline to respond to Staff's amended ISRS recommendation.

On October 6, 2014, Laclede Gas Company (Laclede or Company) of St. Louis, Missouri, the Commission Staff, and the Office of the Public Counsel entered into a Unanimous Stipulation and Agreement for Commission approval of an additional \$2,780,045 worth of annual ISRS revenues.

On October 7, 2014, Laclede filed a RESPONSE TO STAFF'S AMENDED RECOMMENDATION AND MOTION FOR EXPEDITED TREATMENT (Motion) with the Missouri Public Service Commission (Commission) stating that it "accepts" Staff's amended recommendation and requested an October 18, 2014 effective date.

STAFF'S ACTION & RECOMMENDATION

The Staff has reviewed Laclede's tariff sheet. Staff's analysis indicates that the tariff sheet filed by Laclede on October 6, 2014, complies with the Staff's September 30, 2014 amended recommendation. Staff raises no objection to the expedited effective date of October 18, 2014.

The Staff has verified that the Company has filed its annual report and is not delinquent on any assessment. The Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

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Therefore, Staff recommends that the following tariff sheet, as filed on October 6, 2014, be allowed to go into effect on October 18, 2014, as requested by Laclede.

P.S.C. MO. No. 5

Twenty-Third Revised Sheet No. 12, CANCELLING Twenty-Second Revised Sheet No. 12

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Verified Application and Petition of Laclede Gas Company to Change its Infrastructure System Replacement Surcharge in Its Laclede Gas Service Territory

Case No. GR-2015-0026

AFFIDAVIT OF THOMAS M. IMHOFF

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STATE OF MISSOURI)) ss COUNTY OF COLE)

Thomas M. Imhoff, of lawful age, on oath states: that he participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was provided to him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief.

Thomas M. Imhoff

Subscribed and sworn to before me this 4th day of October, 2014.

