

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

In the Matter of the Filing of Laclede Gas	)	
Company's PGA Factors to be Reviewed in	)	<b><u>Case No. GR-2013-0253</u></b>
its 2011-2012 ACA Filing	)	

**STAFF REPLY TO LACLEDE GAS COMPANY'S  
RESPONSE TO STAFF RECOMMENDATIONS**

**COMES NOW** the Staff of the Missouri Public Service Commission and for its Reply to Laclede Gas Company's ("Laclede") Response to Staff Recommendations regarding Laclede's 2011-2012 Actual Cost Adjustment ("ACA") filing, states as follows:

1. Laclede filed its ACA for the 2011-2012 period in this case on October 31, 2012. The Procurement Analysis Unit of Staff reviewed Laclede's ACA filing, and pursuant to Commission order issued on November 20, 2012, Staff filed its recommendation regarding Laclede's ACA filing on December 13, 2013.

2. In its recommendation for the 2011/2012 ACA period, Staff proposed no monetary adjustments to Laclede's September 30, 2012, ending ACA balances, as shown in the table set forth on page 10 of Staff's recommendation memorandum filed herein. However, as reflected in Staff's recommendation, Staff had some comments / concerns / recommendations and requested that Laclede be ordered to respond to Staff's recommendation.

3. On January 15, 2014, the Commission issued an *Order Directing Laclede to Respond to Staff's Recommendation* no later than February 14, 2014. Pursuant to that order, on February 14, 2014, Laclede filed its Response to Staff Recommendations. In the **Conclusion** section of its Response, Laclede stated that "Based on the matters raised in Staff's Memorandum and Laclede's responses herein, there does not appear

to be any issues that require either a procedural schedule or resolution by the Commission. Laclede requests that the Commission approve the ACA balances in the Staff's Memorandum and close this case." Staff agrees, **with the following caveat** – this case should remain open, with ACA balances unapproved, until the prior Laclede ACA balances (for the periods 2004-2005 through 2010-2011) are established and the corresponding cases are closed.

4. On February 19, 2014, the Commission issued an *Order Establishing Ending ACA Balances* in multiple Laclede ACA cases (Case Nos. GR-2005-0203, GR-2006-0288, GR-2008-0140, GR-2008-0387, GR-2010-0138, GR-2011-0055, and GR-2012-0133) with an effective date of March 1, 2014, which establishes ending balances for each of the ACA periods from 2004/2005 through 2010/2011 and **closes each of those ACA cases on March 2, 2014**. Therefore, the Commission may issue its order establishing ending ACA balances in this case and closing this case **after March 2, 2014**, but not before.

**WHEREFORE**, the Staff prays the Commission accept this Reply and issue an order after March 2, 2014, establishing Laclede's ending ACA balances for 2011-2012 as reflected in the table on page 10 of Staff's recommendation memorandum filed herein, **Section VI. Recommendations**, and closing this case.

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 all counsel of record this 20<sup>th</sup> day of February, 2014.

**/s/ Jeffrey A. Keevil**