BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Laclede Gas Company, Missouri Gas Energy's Purchased Gas Adjustment Tariff Filing

Case No. GR-2014-0324

STAFF PLEADING IN COMPLIANCE WITH COMMISSION ORDER SETTING DEADLINE FOR FILING AGREEMENT OR OTHER PLEADING

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COMES NOW the Staff of the Missouri Public Service Commission, pursuant to the Commission's *Order Setting Deadline for Filing Agreement or Other Pleading* (the "Order") issued herein on May 26, 2016, and states as follows:

1. The Order issued on May 26th required the filing of either a stipulation and agreement resolving Staff's concerns regarding Missouri Gas Energy's ("MGE") School Transportation Program ("STP") or a pleading indicating no agreement had been reached, no later than August 31, 2016.

2. After issuance of the Order on May 26, Staff and MGE continued discussions and the exchange of information as discussed in the *Status Report* filed herein by Staff on May 23, 2016. However, no agreement was reached.

3. Staff would also note that in addition to the STP issue, there is also a separate issue in this case concerning compliance with the gas supply documentation requirements of Laclede's CAM (cost allocation manual) and Standards of Conduct. On June 15, 2016, Staff filed a response¹ to a previous MGE pleading, in which Staff requested that "The Commission open a docket for the purpose of investigating Laclede Gas Company's compliance with the gas supply documentation requirements

¹ EFIS entry Number 35.

of the CAM and Standards of Conduct." Thereafter, MGE filed a response² to Staff on June 27, 2016, opposing the creation of an investigatory docket as requested by Staff; Staff filed a reply³ to MGE's response on July 7, 2016; and MGE filed another response⁴ to Staff's reply on July 18, 2016. Staff continues to support the opening of a docket as set forth in its prior filings. To date, the Commission has not issued an order granting or denying the request to open a docket for the purpose of investigating Laclede Gas Company's compliance with the gas supply documentation requirements of

CAM and Standards of Conduct. Therefore, this case should remain open at least until an order is issued ruling on this pending matter.

WHEREFORE, Staff submits this pleading in compliance with the Commission's Order Setting Deadline for Filing Agreement or Other Pleading issued on May 26, 2016.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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² EFIS entry Number 36.

³ EFIS entry Number 37.

⁴ EFIS entry Number 38.

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 31st day of August, 2016.

/s/ Jeffrey A. Keevil