

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

In the Matter of the Application of)	
Southern Union Company d/b/a Missouri)	
Gas Energy, for Approval to Change its)	Case No. GO-2013-0391
Infrastructure System Replacement)	
Surcharge.)	

**AMENDMENT TO PUBLIC COUNSEL'S
REPLY TO THE RESPONSES OF STAFF AND MGE**

COMES NOW the Missouri Office of the Public Counsel (OPC) and for its Amendment to its Reply to the Responses filed by Staff and Missouri Gas Energy (MGE), filed pursuant to 4 CSR 240-2.080(18), OPC states:

1. This filing amends OPC's April 30, 2013 Reply to the Responses of Staff and MGE by providing a document (see Attachment) that summarizes the timing of Infrastructure System Replacement Surcharge (ISRS) Petitions filed with the Commission, and the dates that those Petitions were approved by the Commission.
2. OPC counted thirty-two (32) separate petitions filed with the Commission since the ISRS statute took effect on August 28, 2003 (excluding the present case). In only two instances out of thirty-two did the Commission approve an ISRS more than three years since the company's last rate case, and in those two instances, the gas company had a rate case pending, and therefore qualified for the exception under Section 393.1012.2 RSMo.
3. This summary of prior ISRS Petitions shows that the practice before the Commission has been to require all ISRS petitions to be approved no later than three-years after the last rate case.

WHEREFORE, the Office of the Public Counsel respectfully offers this Amendment to its previously filed Reply to the Responses of Staff and MGE.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 30^h day of April 2013:

/s/ Marc Poston

History of ISRS Petitions in Missouri

<u>Gas Company</u>	<u>Case No</u>	<u>Date Petition Filed</u>	<u>Last Rate Case Effec.</u>	<u>Plus 3 Years</u>	<u>Petition Approved</u>	<u>Pending Rate Case?</u>
MGE	GO-04-0242	12/3/2003	8/6/2001	8/6/2003	3/8/2004	YES
MGE	GO-05-0273	2/14/2005	10/2/2004	10/2/2007	5/11/2005	NO
MGE	GO-06-0201	11/7/2005	10/2/2004	10/2/2007	1/16/2006	NO
MGE	GO-06-0556	6/29/2006	10/2/2004	10/2/2007	9/27/2006	NO
MGE	GO-08-0113	10/17/2007	4/3/2007	4/3/2010	1/14/2008	NO
MGE	GO-09-0009	7/2/2008	4/3/2007	4/3/2010	9/28/2008	NO
MGE	GO-09-0302	2/19/2009	4/3/2007	4/3/2010	5/13/2009	NO
MGE	GO-11-0003	7/2/2010	2/20/2010	2/20/2013	9/14/2010	NO
MGE	GO-11-0269	2/22/2011	2/20/2010	2/20/2013	5/16/2011	NO
MGE	GO-12-0144	11/8/2011	2/20/2010	2/20/2013	2/10/2012	NO
MGE	GO-13-0015	7/11/2012	2/10/2010	2/10/2013	10/1/2012	NO
Laclede	GO-04-0443	3/1/2004	11/9/2002	11/9/2005	6/14/2004	NO
Laclede	GO-05-0119	10/28/2004	11/9/2002	11/9/2005	1/4/2005	NO
Laclede	GO-05-0351	4/4/2005	11/9/2002	11/9/2005	6/16/2005	NO
Laclede	GO-06-0377	3/31/2006	10/1/2005	10/1/2008	6/8/2006	NO
Laclede	GO-07-0177	11/3/2006	10/1/2005	10/1/2008	12/28/2006	NO
Laclede	GO-07-0370	3/30/2007	10/1/2005	10/1/2008	6/5/2007	NO
Laclede	GO-08-0155	11/9/2007	7/29/2007	7/29/2010	1/15/2008	NO
Laclede	GO-08-0351	4/25/2008	7/29/2007	7/29/2010	6/24/2008	NO
Laclede	GO-09-0221	11/21/2008	7/29/2007	7/29/2010	2/14/2009	NO
Laclede	GO-09-0389	4/28/2009	7/29/2007	7/29/2010	7/15/2009	NO
Laclede	GO-10-0212	1/15/2010	7/29/2007	7/29/2010	3/24/2010	NO
Laclede	GO-11-0058	10/29/2010	8/18/2010	8/18/2013	1/5/2012	NO
Laclede	GO-11-0361	5/2/2011	8/18/2010	8/18/2013	7/6/2011	NO
Laclede	GO-12-0145	11/9/2011	8/18/2010	8/18/2013	1/11/2012	NO
Laclede	GO-12-0356	4/27/2012	8/18/2010	8/18/2013	7/3/2012	NO
Laclede	GO-13-0352	1/11/2013	8/18/2010	8/18/2013	3/13/2013	NO
Atmos	GO-09-0056	8/14/2008	3/4/2007	3/4/2010	10/31/2008	NO
Atmos	GO-10-0168	12/1/2009	3/4/2007	3/4/2010	3/2/2010	NO
Atmos	GO-11-0149	11/22/2010	9/1/2010	9/1/2013	2/8/2011	NO
Ameren	GO-10-0257	3/12/2010	3/15/2007	3/15/2010	6/28/2010	YES
Liberty	GO-13-0048	8/8/2012	9/1/10 (Atmos)	9/1/2013	10/31/2012	NO