

**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. GO-2015-0341

In the Matter of the Application of)
Laclede Gas Company to Change its)
Infrastructure System Replacement)
Surcharge in its Missouri Gas Energy)
Service Territory.)
Case No. GO-2015-0343

RESPONSE TO RECONCILIATION UPDATE

COMES NOW the Missouri Office of the Public Counsel and for its Response to Reconciliation Update states:

1. On October 28, 2015, the Commission’s Staff filed a Reconciliation Update to update the Staff’s calculation of the value of the telemetry equipment issue (EFIS No. 51). The Staff’s filing explained, “Staff did not realize that OPC was contesting any additional amount for telemetry equipment beyond what was included in the two work orders.” This statement was footnoted with a sentence stating, “The OPC testimony did not state exactly what was being contested.”

2. While Public Counsel accepts the Staff’s claim that it was not aware that OPC contested more telemetry costs than just the two large work orders, Public Counsel disagrees with the statement that Public Counsel’s testimony did not state exactly what was being contested.

3. To clarify any confusion over what is contested, Public Counsel refers the Commission to the testimony of Public Counsel's witness, Ms. Jacqueline Moore, where she identified the telemetry costs being disputed by Public Counsel:

Q. PLEASE DESCRIBE THE COSTS OF THE TELEMETRIC EQUIPMENT REPLACEMENTS DISPUTED BY PUBLIC COUNSEL.

A. As shown in Schedule JSM-2, there are several items related to telemetric equipment replacement which Laclede seeks to recover through the ISRS. The net of these items is \$401,258.82. The majority of these costs were incurred through work orders #60418 and #60419, which are also included in Schedule JSM-2.

(Exhibit 200, p.6). **Schedule JSM-2**, referenced above, is a table that identifies each contested project cost by work order number, project description, in-service date, and the project cost. The sum of these items is the **\$401,258** being contested. This includes **\$339,200** for the two large telemetry work orders (#60418 and #60419), and an additional **\$62,057** associated with four smaller telemetry work orders (#001172, #003306, #003402, and #00537) (Ex. 200, Schedule JSM-2).

WHEREFORE, the Office of the Public Counsel respectfully submits this response to the Staff's reconciliation update.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

By: /s/ Marc D. Poston

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to all counsel of record this 28th day of October 2015.

/s/ Marc Poston
