

# Appendix B

**Missouri Public Service Commission****Respond Data Request**

<b>Data Request No.</b>	0232
<b>Company Name</b>	Missouri Gas Energy (Laclede)-Investor(Gas)
<b>Case/Tracking No.</b>	GR-2014-0007
<b>Date Requested</b>	3/11/2014
<b>Issue</b>	Expense - Payroll
<b>Requested From</b>	Michael R Noack
<b>Requested By</b>	John Borgmeyer
<b>Brief Description</b>	MGE job positions added and eliminated
<b>Description</b>	1. Identify each and every job position added and eliminated for Missouri Gas Energy for the period a) January 1, 2014 through February 28, 2014 b) planned/ expected to be added and eliminated March 1, 2014 through April 30, 2014. Provide by job position, individual name and existing salary/ wage rates for each position added and eliminated. 2. Identify each and every employee who has received a promotion and demotion for Missouri Gas Energy for the period a) January 1, 2014 through February 28, 2014 b) planned/ expected promotion and demotion from March 1, 2014 through April 30, 2014. Provide job position for each promotion and previous job position, individual name and existing salary / wage rates. Provide job position for each demotion and previous job position, individual name and existing salary / wage rates. DR requested by Keith Majors (Keith.Majors@psc.mo.gov).
<b>Response</b>	With respect to OPC Data Request 232, MGE objects to this data request as it seeks the discovery of information which is irrelevant, immaterial and inadmissible in GR-2014-0007, and which discovery is not reasonably calculated to lead to the production of relevant and admissible evidence in GR-2014-0007.. Without waiving its objections to this data request, MGE refers Staff to the monthly reports related to staffing that it has provided pursuant to its obligations under GM-2013-0254.
<b>Objections</b>	NA

The attached information provided to **Missouri Public Service Commission** Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the **Missouri Public Service Commission** if, during the pendency of Case No. **GR-2014-0007** before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the **Missouri Gas Energy (Laclede)-Investor(Gas)** office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or

## Missouri Public Service Commission

### Respond Data Request

<b>Data Request No.</b>	0233
<b>Company Name</b>	Missouri Gas Energy (Laclede)-Investor(Gas)
<b>Case/Tracking No.</b>	GR-2014-0007
<b>Date Requested</b>	3/11/2014
<b>Issue</b>	Expense - Payroll
<b>Requested From</b>	Michael R Noack
<b>Requested By</b>	John Borgmeyer
<b>Brief Description</b>	Laclede Gas job positions added and eliminated
<b>Description</b>	Identify each and every job position eliminated and added for Laclede Gas Company and The Laclede Group for the period from March 31, 2013-- the end of the update period in Laclede Gas' last rate case, Case No. GR-2013-0171-- to February 28, 2014 and planned to be eliminated and added from March 1 through April 30, 2014. List by individual, job position and salary / wage rates and date of employment. DR requested by Keith Majors@psc.mo.gov
<b>Response</b>	With respect to OPC Data Request 233, MGE objects to this data request as it seeks the discovery of information which is irrelevant, immaterial and inadmissible in GR-2014-0007, and which discovery is not reasonably calculated to lead to the production of relevant and admissible evidence in GR-2014-0007. Without waiving its objections to this data request, MGE refers Staff to the monthly reports related to staffing that it has provided pursuant to its obligations under GM-2013-0254.
<b>Objections</b>	NA

The attached information provided to **Missouri Public Service Commission** Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the **Missouri Public Service Commission** if, during the pendency of Case No. **GR-2014-0007** before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the **Missouri Gas Energy (Laclede)-Investor(Gas)** office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to **Missouri Gas Energy (Laclede)-Investor(Gas)** and its employees, contractors, agents or others employed by or acting in its behalf.

<b>Security :</b>	Public
<b>Rationale :</b>	NA

## Missouri Public Service Commission

### Respond Data Request

<b>Data Request No.</b>	0234
<b>Company Name</b>	Missouri Gas Energy (Laclede)-Investor(Gas)
<b>Case/Tracking No.</b>	GR-2014-0007
<b>Date Requested</b>	3/11/2014
<b>Issue</b>	Expense - Payroll
<b>Requested From</b>	Michael R Noack
<b>Requested By</b>	John Borgmeyer
<b>Brief Description</b>	MGE and Laclede Gas terminations
<b>Description</b>	1. Identify all individuals who have been given notice of termination/ separation from Missouri Gas Energy division to be effective during the period January 1, 2014 through December 31, 2014 providing when this termination / separation took place/ is to take place. Identify by job position, individual name and existing salary/ wage rates. 2. Identify all individuals who have been given notice of termination/ separation from Laclede Gas Company to be effective during the period January 1, 2014 through December 31, 2014 providing when this termination / separation took place/ is to take place. Identify by job position, individual name and existing salary/ wage rates. DR requested by Keith Majors (Keith.Majors@psc.mo.gov).
<b>Response</b>	With respect to OPC Data Request 234, MGE objects to this data request as it seeks the discovery of information which is irrelevant, immaterial and inadmissible in GR-2014-0007, and which discovery is not reasonably calculated to lead to the production of relevant and admissible evidence in GR-2014-0007. Without waiving its objections to this data request, MGE refers Staff to the monthly reports related to staffing that it has provided pursuant to its obligations under GM-2013-0254.
<b>Objections</b>	NA

The attached information provided to **Missouri Public Service Commission** Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the **Missouri Public Service Commission** if, during the pendency of Case No. **GR-2014-0007** before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the **Missouri Gas Energy (Laclede)-Investor(Gas)** office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to **Missouri Gas Energy (Laclede)-Investor(Gas)** and its employees, contractors, agents or others employed by