

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

In The Matter of) **File No. GR-2015-0201**
Laclede Gas Company's PGA Filing) Tariff No. JG-2015-0258

STAFF RECOMMENDATION TO APPROVE DECREASE TO INTERIM RATES

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its recommendation in this matter hereby states:

1. On February 13, 2015, Laclede Gas Company filed a proposed tariff sheet, bearing an effective date of March 1, 2015. If approved, the tariff sheet will decrease the Company's Purchased Gas Adjustment (PGA) charge. In its filing letter, Laclede attributed this proposed PGA to the decrease in the Company's gas supply costs that has occurred since the Company established its existing PGA rates last October.¹

2. On February 17, the Commission directed Staff to file a recommendation on the Company's tariff by February 23, 2015. Staff's recommendation is attached hereto as Appendix A and incorporated by reference.

3. As explained in Staff's recommendation, the total PGA rate filed by Laclede will decrease to \$0.31435 per therm for the first 30 therms from the current PGA rate of \$0.36855 per therm. For all therms in excess of the first 30 therms, the PGA rate filed by Laclede will decrease to \$.55846 per therm from the current PGA rate of \$.61266 per therm. These changes represent a decrease of \$0.0542 per therm. The LPPGA will decrease from \$4.46778 per gallon to \$3.43927 per gallon. This is a decrease of \$1.02851 per gallon.

¹ See GR-2014-0231.

4. Case No. GR-2015-0201, under which these changes were filed, was established to track the Company's PGA factors to be reviewed in its 2014-2015 ACA filing. Case No. 2014-0231 and GR-2014-0121 were established to track the Company's PGA factors to be reviewed in its 2013-2014 and 2012-2013 ACA filings respectively. This rate change should be on an interim, subject to refund status pending final Commission decisions in ACA Case Nos. GR-2015-0201, GR-2014-0231 and GR-2014-0121.

5. Staff is of the opinion that good cause for approval of this tariff sheet on less than thirty (30) days' notice is demonstrated by Laclede's Commission-approved PGA Clause allowing for ten (10) business days' notice for PGA change filings. Staff has verified that Laclede has filed its annual report and is not delinquent on any of its assessment. Other than the cases mentioned above, Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

WHEREFORE, Staff recommends that the following tariff sheet, filed on February 13, 2015, be approved to become effective on March 1, 2015, interim subject to refund:

P.S.C. MO. No. 5

Two Hundred and Twenty-Third Revised Sheet No. 29, Cancelling Two Hundred and Twenty-Second Revised Sheet No. 29

Respectfully Submitted,

/s/ John D. Borgmeyer

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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 20th day of February, 2015.

/s/ John D. Borgmeyer

MEMORANDUM

TO: Missouri Public Service Commission Official Case File,
Case No. GR-2015-0201, File No. JG-2015-0258
Laclede Gas Company

FROM: Kim Cox, Energy Department – Tariffs/Rate Design

Thomas M. Imhoff/ 2/20/2015 John D. Borgmeyer/ 2/20/2015
Utility Operations Division/Date Staff Counsel's Office/Date

SUBJECT: Staff Recommendation for Laclede Gas Company's Optional Winter Season PGA Filing Effective March 1, 2015

DATE: February 20, 2015

On February 13, 2015, Laclede Gas Company (Laclede or Company) of St. Louis, Missouri, filed a tariff sheet proposed to become effective March 1, 2015. The tariff sheet was filed to reflect scheduled changes in Laclede's Purchased Gas Adjustment (PGA) factors as the result of an estimated change in the cost of natural gas for the remaining winter season and changes in the L. P. Gas PGA (LPPGA). Laclede defines its Winter Season as November through April. All other gas companies have a five-month winter season, November through March. The PGA impact on a customer's bill is during the remainder of Laclede's six-month winter season.

The total PGA rate filed by Laclede will decrease to \$0.31435 per therm for the first 30 therms from the current PGA rate of \$0.36855 per therm. For all therms in excess of the first 30 therms, the PGA rate filed by Laclede will decrease to \$.55846 per therm from the current PGA rate of \$.61266 per therm. These changes represent a decrease of \$0.0542 per therm. The LPPGA will decrease from \$4.46778 per gallon to \$3.43927 per gallon. This is a decrease of \$1.02851 per gallon.

Case No. GR-2015-0201, under which these changes were filed, was established to track the Company's PGA factors to be reviewed in its 2014-2015 ACA filing. Case No. 2014-0231 and GR-2014-0121 were established to track the Company's PGA factors to be reviewed in its 2013-2014 and 2012-2013 ACA filings respectively. This rate change should be on an interim, subject to refund status pending final Commission decisions in ACA Case Nos. GR-2015-0201, GR-2014-0231 and GR-2014-0121.

Staff has verified that Laclede has filed its annual report, and is not delinquent on its PSC assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

Staff has reviewed this filing and has determined it was calculated in conformance with Laclede's PGA Clause. Staff is of the opinion that good cause for approval of this tariff sheet on less than thirty (30) days' notice is demonstrated by Laclede's Commission-approved PGA clause allowing for ten (10) business days notice for PGA change filings. Therefore, Staff

recommends the following tariff sheet as filed on February 13, 2015, be approved on an interim basis, subject to refund:

P.S.C. MO. No. 5

Two Hundred and Twenty-Third Revised Sheet No. 29, Cancelling Two Hundred and Twenty-Second Revised Sheet No. 29

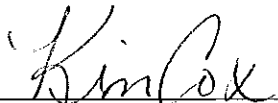
**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Laclede Gas Company's)
PGA Filing) Case No. GR-2015-0201

AFFIDAVIT OF KIM COX

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

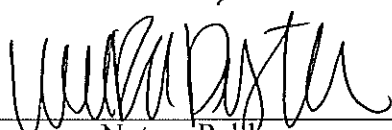
Kim Cox of lawful age, on oath states: that she participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was provided to her; that she has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of her knowledge and belief.



Kim Cox

Subscribed and sworn to before me this 19th day of February, 2015.

LAURA DISTLER
Notary Public - Notary Seal
STATE OF MISSOURI
Commissioned for Cole County
My Commission Expires: June 21, 2015
Commission Number: 11203914



Notary Public