



October 1, 2014 through September 30, 2015, to determine whether there exists an over-recovery or under-recovery of the ACA balances. An over-recovery by the Company is shown as a negative balance that must be returned to customers; an under-recovery is shown as a positive balance that must be collected from customers.

3. Based on its review, as discussed in further detail in the accompanying Staff Recommendation Memorandum, Staff has proposed no dollar adjustments at this time to the Company's ACA account balances filed October 28, 2015. However, Staff recommends the Commission hold this case open pending further investigation into Laclede's compliance with the gas supply documentation requirements of Laclede's CAM and Standards of Conduct, as discussed in the "Gas Supply and Transportation Standards of Conduct" subsection of the Staff Recommendation Memorandum.

4. Also, based on its review, Staff has certain other concerns and recommendations as reflected in the accompanying Staff Recommendation Memorandum. Staff recommends the Commission order Laclede to respond to these recommendations and concerns within forty-five (45) days.

**WHEREFORE**, for the reasons stated above and discussed in detail in the accompanying Staff Recommendation Memorandum, Staff recommends the Commission issue an order directing Laclede to respond within 45 days to Staff's recommendations and concerns included in the Staff Recommendation Memorandum and to hold this case open<sup>1</sup> pending further investigation into Laclede's compliance with the gas supply documentation requirements of Laclede's CAM and Standards of

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<sup>1</sup> The preliminary ACA account balances shown in the table in the "Recommendations" section of the Staff Recommendation Memorandum should not be finalized at this time.

Conduct, as discussed in the “Gas Supply and Transportation Standards of Conduct” subsection of the Staff Recommendation Memorandum.

Respectfully submitted,

**/s/ Jeffrey A. Keevil**

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### **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 16<sup>th</sup> day of December, 2016.

**/s/ Jeffrey A. Keevil**