

**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
Tracking No. YG-2016-0109

STAFF RECOMMENDATION

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

1. On October 28, 2015, Laclede Gas Company ("Laclede" or "Company") filed a tariff sheet to reflect changes in its Purchased Gas Adjustment (PGA) factors as a result of estimated changes in the cost of natural gas for the upcoming season and changes in the Company's Actual Cost Adjustment (ACA) factors. The tariff sheet bears a proposed effective date of November 13, 2015. Also on October 28, 2015, Laclede filed an Application for Variance and Request for Expedited Treatment to allow the rate change to go into effect November 6, 2015, or as soon thereafter as reasonably practical.

2. Pursuant to the filing, the total residential general winter only PGA rate will decrease to \$0.22004 per therm for the first 30 therms from the current PGA rate of \$0.31435 per therm. For all therms in excess of the first 30 therms, this PGA rate will decrease to \$.46415 per therm from the current PGA rate of \$.55846 per therm. These changes represent a decrease of \$0.09431 per therm. The LPPGA will decrease from \$3.43927 per gallon to \$.89671 per gallon. This is a decrease of \$2.54256 per gallon.

3. The Company's filing also reflects adjustments to the Company's ACA factors. Staff's Procurement Analysis Unit (PAU) will review the Company's ACA filing and may recommend adjustments to the ACA account balance(s). Due to the limited time available to review the documentation supporting the ACA factors represented in this filing, the PAU has requested permission to submit its results and recommendations regarding the information included in this ACA filing to the Commission on or before December 16, 2016.

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. GR-2014-0231 was established to track the Company's PGA factors to be reviewed in its 2013-2014 ACA filing. As explained in Staff's *Memorandum*, attached hereto and incorporated herein by reference, Staff has reviewed the current filing and determined that it was calculated in conformance with the Company's PGA clause. Therefore, Staff recommends the Commission approve the tariff sheet on an interim, subject to refund status pending final Commission decisions in ACA Case Nos. GR-2015-0201 and GR-2014-0231.

5. Staff also recommends the Commission order PAU Staff to file the results of its review of the ACA factors represented in this filing no later than December 16, 2016.

6. Staff has verified that the Company has filed its annual report, and is not delinquent on its PSC assessment. Staff is not aware of any other matters before the Commission that affects or is affected by this filing, other than those mentioned above.

7. Staff is of the opinion that good cause for approval of the 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.

WHEREFORE, Staff recommends the Commission grant the Company's request for a one-time variance from its PGA tariff and approve the following tariff sheet to become effective on November 6, 2015, or as soon thereafter as reasonably practical, on an interim basis, subject to refund, and that the Commission order PAU Staff to file the results of its ACA review in this docket no later than December 16, 2016:

P.S.C. MO No. 5 Consolidated

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

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 3rd day of November, 2015.

/s/ Jeffrey A. Keevil

MEMORANDUM

TO: Missouri Public Service Commission Official Case File,
Case No. GR-2015-0201, File No. YG-2016-0109
Laclede Gas Company

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

/s/ Thomas M. Imhoff 11/3/2015
Utility Operations Division/Date

/s/ Jeffrey A. Keevil 11/3/2015
Staff Counsel's Office/Date

SUBJECT: Staff Recommendation for Laclede Gas Company's Scheduled Winter Season
PGA Filing Effective November 13, 2015 and Request for Expedited
Treatment

DATE: November 3, 2015

On October 28, 2015, Laclede Gas Company (Laclede or Company) of St. Louis, Missouri, filed a tariff sheet with an effective date of November 13, 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 winter season and changes in the Actual Cost Adjustment (ACA) factor.

On October 28, 2015, Laclede also filed an Application for Variance and Request for Expedited Treatment ("Request") to allow the rate change to go into effect November 6, 2015, or as soon thereafter as reasonably practical.

The total residential general winter only PGA rate filed by Laclede will decrease to \$0.22004 per therm for the first 30 therms from the current PGA rate of \$0.31435 per therm. For all therms in excess of the first 30 therms, this PGA rate filed by Laclede will decrease to \$.46415 per therm from the current PGA rate of \$.55846 per therm. These changes represent a decrease of \$0.09431 per therm. The LPPGA will decrease from \$3.43927 per gallon to \$.89671 per gallon. This is a decrease of \$2.54256 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 was established to track the Company's PGA factors to be reviewed in its 2013-2014 ACA filing. This rate change should be on an interim, subject to refund status pending final Commission decisions in ACA Case Nos. GR-2015-0201 and GR-2014-0231.

Due to the limited time available to review the documentation supporting the ACA factor represented in this filing, the Procurement Analysis Unit (PAU) has requested permission to submit its results and recommendations regarding the information included in this ACA filing to the Commission on or before December 16, 2016.

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, other than as mentioned above.

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. Staff recommends the filing and request for a one-time variance from the Company's PGA tariff and expedited treatment be approved to become effective on November 6, 2015, or as soon thereafter as reasonably practical, and that the following tariff sheet filed on October 28, 2015, be approved on an interim basis, subject to refund:

P.S.C. MO. No. 5 Consolidated

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

AFFIDAVIT

COMES NOW Kim Cox and on her oath declares that she is of sound mind and lawful age; that she contributed to the attached Staff Recommendation and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.


_____ **Kim Cox**

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 3rd day of November, 2015.


_____ **NOTARY PUBLIC**

