

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

In the Matter of Laclede)
Gas Company's PGA Filing)

Case No. GR-2016-0224

**STAFF REPLY TO SPIRE MISSOURI INC.'S
RESPONSE TO STAFF'S RECOMMENDATION AND MEMORANDUM**

COMES NOW the Staff of the Missouri Public Service Commission and replies as follows to the *Response to Staff's Recommendation and Memorandum Regarding Laclede Gas Company's 2015-2016 Actual Cost Adjustment Filing* filed herein by Spire Missouri Inc. ("Spire Missouri" or "Company"):

1. Staff filed its Actual Cost Adjustment ("ACA") Recommendation in this case concerning Spire Missouri's eastern Missouri service territory's ("Spire Missouri East") (f/k/a Laclede Gas Corporation) 2015-2016 ACA filing on December 18, 2017. In its ACA Recommendation, Staff recommended the Commission hold this case open pending resolution of Staff's investigation of Spire Missouri's compliance with the requirements of the CAM and Standards of Conduct in Case No. GO-2017-0223 and resolution of all prior Spire Missouri East ACA cases that remain open and reduce total gas costs by \$114,273. In its ACA Recommendation Staff also requested the Commission order Laclede to respond to certain other comments, concerns and recommendations contained therein.

2. Spire Missouri filed its *Response to Staff's Recommendation and Memorandum Regarding Laclede Gas Company's 2015-2016 Actual Cost Adjustment Filing* ("Response") on February 1, 2018, stating that the reduction of gas costs recommended by Staff to account for an off-system sales error was unnecessary.

In addition, Spire Missouri states that it provided initial workpapers to Staff showing that it made an adjustment in May 2016 already accounting for the error.

3. Staff's Procurement Analysis Unit has reviewed the Company's Response and is currently in the process of reviewing the initial workpapers provided by the Company. Staff and the Company plan to meet to further discuss this adjustment on February 13, 2018. Spire Missouri's responses relating to all other comments, concerns and recommendations contained in Staff's ACA Recommendation are acceptable.

4. Staff recommends the Commission not establish the final balances for Spire Missouri's 2015-2016 ACA at this time and recommends this case remain open pending a resolution of Staff's investigation in Case No. GO-2017-0223 and resolution of all prior Spire Missouri East ACA cases that remain open,.

WHEREFORE, Staff submits its *Reply to Spire Missouri's Response to Staff's Recommendation and Memorandum Regarding Laclede Gas Company's 2015-2016 Actual Cost Adjustment Filing* and requests that this case remain open¹ and that the Commission issue an order directing Staff to provide a supplemental response by March 16, 2018, addressing Spire Missouri's response to Staff's recommendation to reduce gas costs by \$114,273.

¹ The ACA account balances should not be finalized at this time.

Respectfully Submitted,

/s/ Mark Johnson

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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 9th day of February, 2018.

/s/ Mark Johnson