

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

In the matter of Union Electric Company	)	
d/b/a AmerenUE's Purchased Gas	)	
Adjustment Factors to be Audited in its	)	Case No. GR-2008-0107
2006-2007 Actual Cost Adjustment.	)	

In the matter of Union Electric Company	)	
d/b/a AmerenUE's Purchased Gas	)	
Adjustment Factors to be Audited in its	)	Case No. GR-2008-0366
2007-2008 Actual Cost Adjustment.	)	

In the matter of Union Electric Company	)	
d/b/a Ameren Missouri's Purchased Gas	)	
Adjustment Factors to be Audited in its	)	Case No. GR-2009-0337
2008-2009 Actual Cost Adjustment.	)	

In the matter of Union Electric Company	)	
d/b/a Ameren Missouri's Purchased Gas	)	
Adjustment Factors to be Audited in its	)	Case No. GR-2010-0180
2009-2010 Actual Cost Adjustment.	)	

In the matter of Union Electric Company	)	
d/b/a Ameren Missouri's 2010-2011 ACA	)	
Audit.	)	Case No. GR-2012-0077
	)	

In the Matter of Laclede Gas Company's	)	
Purchased Gas Adjustment for 2006-2007	)	Case No. GR-2008-0140

In the Matter of Laclede Gas Company's	)	
Purchased Gas Adjustment for 2007-2008	)	Case No. GR-2008-0387

In the Matter of Laclede Gas Company's	)	
Purchased Gas Adjustment for 2008-2009	)	Case No. GR-2010-0138

In the Matter of Laclede Gas Company's	)	
PGA Factors to be Reviewed in Its	)	Case No. GR-2011-0055
2009-2010 ACA Filing	)	

In the Matter of Laclede Gas Company's	)	
Purchased Gas Adjustment for 2010-2011	)	Case No. GR-2012-0133

**JOINT RESPONSE OF UNION ELECTRIC COMPANY d/B/A AMEREN  
MISSOURI AND LACLEDE GAS COMPANY TO STAFF RESPONSE**

COMES NOW, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) and Laclede Gas Company (“Laclede”) ( jointly “the Companies”) and state as follows:

1. On July 15, 2013, the Companies filed their *Joint Verified Motion of Union Electric Company d/b/a Ameren Missouri and Laclede Gas Company for a Determination on the Pleadings Respecting Issues Relating to MOGas Pipeline, LLC*. ("Joint Motion.")

2. On July 18, 2012, the Missouri Public Service Commission ("Commission") issued its *Order Directing Filing*. This order set a deadline of July 29, 2013, for Staff and any other interested party to file a response.

3. The Missouri Public Service Commission Staff ("Staff") filed its *Staff Response to Joint Verified Motion of Union Electric Company d/b/a Ameren Missouri and Laclede Gas Company* on the Companies Settlement Agreement with MOGas Pipeline, LLC (MOGas) on July 29, 2013. No other party filed a response.

4. In its response, Staff generally supported the relief that is being sought by the Joint Motion.

5. As stated in the Wherefore clause of the Companies' Joint Verified Motion, the Companies continue to pray that the Commission make and enter its order resolving and disposing of all MoGas Pipeline, LLC related issues in these ACA dockets, and more specifically enter an order as follows:

- a. Determining that it was prudent and reasonable for Ameren Missouri and Laclede to enter into the Settlement Agreement;

- b. Closing these ACA dockets with respect to all MoGas related issues effective upon issuance of the order (but subject to the requirement that, on a going forward basis, Ameren Missouri and Laclede return the funds to be paid to them by MoGas hereunder to their retail customers through their PGA mechanisms, as herein provided);
  - c. Determining that there shall be no disallowance of charges from MoGas to Ameren Missouri or Laclede applicable to transportation services provided by MoGas between July 1, 2003, and May 31, 2008;
  - d. Ordering that, upon the making of the payments required to be paid by MoGas to Ameren Missouri and Laclede, the Commission's complaint against MoGas pending in Cole County Circuit Court shall be dismissed;
  - e. Determining that the \$3.506 million payment to be received by Ameren Missouri be included in Ameren Missouri's ACA balance, allocated as provided for on Attachment 2 to the *Joint Motion*, and included in Ameren Missouri's ACA factors to be used starting November 1, 2013<sup>1</sup> (subject to Staff's confirmation of receipt of the payment and review of allocation factors in the appropriate ACA case); and
  - f. Determining that the \$3.676 million payment to be received by Laclede be included in Laclede's ACA balance, allocated as provided for on Attachment 3 to the *Joint Motion*, and included in Laclede's ACA factors to be used starting with effective date of Laclede's new PGA rates in November, 2013<sup>2</sup> (subject to Staff's confirmation of receipt of the payment and review of allocation factors in the appropriate ACA case).
6. The Companies request the Commission grant them the relief as set forth above.

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<sup>1</sup> Should the settlement payments be received by September 30, 2013.

<sup>2</sup> Should the settlement payments be received by September 30, 2013.

Respectfully Submitted,

/s/ Wendy Tatro

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**ATTORNEYS FOR LACLEDE GAS  
COMPANY**

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing Joint Motion was served on all parties to the above listed cases via electronic mail (e-mail) or via certified and regular mail on this 1st day of August, 2013.

/s/ Wendy Tatro  
Wendy Tatro