

5. In its Direct Testimony, Laclede recommended an historical test year ending September 30, 2012, to be updated for known and measurable changes through March 31, 2013, or, in certain instances, July 31, 2013. In Direct Testimony Laclede further explained that, "It is essential that the most recently available information be included in the calculation of rates. Additionally, there are several significant events that will occur between the proposed update period of March 31, 2013 and July 31, 2013. These include, but are not limited to, changes in labor rates paid under the Company's union labor contracts, a possible change in the annual assessment paid to the Commission, and, most importantly, the placement in service of the new Customer Care and Billing system as part of the EIMS project. However, the Company is willing to work with the parties concerning an alternative update method that would obviate the need for a complete true-up."¹

6. Staff's recommendation is that an historical test year ending September 30, 2012, to be updated for all known and measurable changes through March 31, 2013 as proposed by Laclede is appropriate.

7. At this time, Staff is unable to determine whether a true-up audit is deemed necessary in this case. If a full true-up audit is required, Staff is concerned that Laclede's proposed true-up date of July 31, 2013, would not provide adequate time to conduct a full true-up audit.

8. Staff will be in a position to make an informed recommendation after Staff has completed most of its audit. Staff will investigate the need for a true-up during its audit and make a recommendation in its Direct Testimony. However, Staff recommends

¹ EFIS No. 5, *Direct Testimony of Glenn W. Buck*, p. 11, lns. 9-17.

that the Commission leave a true-up hearing on the procedural schedule in case it later determines that a true-up is appropriate.

WHEREFORE, Staff respectfully submits *Staff's Filing Regarding Test Year, Update and True-Up*.

Respectfully Submitted,

**STAFF OF THE MISSOURI
PUBLIC SERVICE COMMISSION**

/s/ John D. Borgmeyer

John D. Borgmeyer
Legal Counsel
Missouri Bar No. 61992

Attorney for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102
Telephone: (573) 751-5472
Fax: (573) 751-9285
Email: john.borgmeyer@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 27th day of February, 2013.

/s/ John D. Borgmeyer