

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

In the Matter of the Application of Laclede Gas)
Company to Change its Infrastructure System) **Case No. GO-2016-0196**
Replacement Surcharge in its Laclede Gas Service)
Territory)

In The Matter of the Application of Laclede Gas)
Company to Change its Infrastructure System) **Case No. GO-2016-0197**
Replacement Surcharge in its Missouri Gas Energy)
Service Territory)

**STATEMENT OF POSITION OF
LACLEDE GAS COMPANY AND MISSOURI GAS ENERGY**

COME NOW Laclede Gas Company (“Laclede”) and Missouri Gas Energy (“MGE”), and submit their Statement of Position in the respective above captioned cases, stating as follows:

1. ISSUE:

May Laclede and MGE’s ISRS filings be updated during the ISRS case to replace two months of budgeted ISRS investments with updated actual ISRS investments?

POSITION:

Yes. This exact issue was raised by OPC and decided by the Commission in the previous Laclede and MGE ISRS cases in November 2015. The Commission has already considered all of the material arguments OPC asserts in this case.

The current process of updating ISRS information fits squarely with the legislative intent, which was to allow more timely cost recovery of gas safety investments and government mandated relocations under a targeted audit process that is backstopped

by a later review for prudence in a rate case. The provision of pro-forma information on ISRS projects is consistent with the common practice of using such information, as updated with actuals, in other proceedings. Contrary to Mr. Hyneman's assertion, there is more than adequate time to review such projects and meet the 60 day timeframe for a Staff Recommendation regarding eligibility and accuracy, as is confirmed in the direct testimony of Staff witnesses Jennifer Grisham and Brian Wells.

WHEREFORE, Laclede respectfully requests that the Commission accept the Laclede and MGE statement of position.

Respectfully submitted,

LACLEDE GAS COMPANY

By: /s/ Rick Zucker

Rick Zucker, #49211

Associate General Counsel

Laclede Gas Company

700 Market Street, 6th Floor

St. Louis, MO 63101

Telephone: (314) 342-0533

Facsimile: (314) 421-1979

E-mail: rick.zucker@thelacledegroup.com

Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing pleading was served on all parties of record on this 21st day of April, 2016 by hand-delivery, e-mail, fax, or by placing a copy of such document, postage prepaid, in the United States mail.

/s/ Marcia Spangler