

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

In the Matter of Laclede Gas Company's     )  
Request to Increase Its Revenues            )  
For Gas Service                                 )            **Case No. GR-2017-0215**

**MOTION FOR LEAVE TO OBJECT OUT-OF-TIME**

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through counsel, and hereby moves the Commission for leave to object to the Division of Energy's data request DR DED-DE 206 out-of-time. The deadline for an objection to be served was Monday, July 31, 2017.

1. On July 21, 2017, the Division of Energy ("DE") served data requests identified as DR DED-DE 206 and DR DED-DE 207 on Staff in two separate emails. The two data requests requested complaints received by Staff regarding the current effective rate design for both Laclede Gas ("LAC") and Missouri Gas Energy ("MGE"). The two requests are identical in all respects except DR DED-DE 206 requested information pertaining to LAC, and DR DED-DE 207 requested information pertaining to MGE.

2. On July 24, 2017, Staff objected to DR DED-DE 207, stating:

Response: The Commission's complaint database does not contain a "rate design" complaint category classification. Therefore it is impossible to electronically search for "all complaints received by Staff regarding the current effective residential rate design" of Missouri Gas Energy as requested by this data request. Staff objects to further responding to this data request ("DR") on the grounds that the DR is (1) vague and ambiguous; (2) unduly burdensome and overly broad; (3) irrelevant; and (4) seeks personally identifiable customer information protected from disclosure pursuant to Section 386.480, RSMo.

3. Unfortunately, Staff did not specifically object to DR DED-DE 206, although it notes the requests are substantively identical.

4. Staff states that due to the large volume of data requests served in both the MGE and LAC cases, along with the oddity of a single company utilizing two dockets simultaneously to conduct rate cases for separate divisions of the same company, Staff inadvertently failed to serve a timely objection regarding DR DED-DR 206. Given that DR DED-DE 206 is identical in all respects to DR DED-DR 207, aside from requesting information relating to LAC, Staff respectfully requests that it be allowed to assert the following objection out of time to DR DED-DE 206:

Response: The Commission's complaint database does not contain a "rate design" complaint category classification. Therefore it is impossible to electronically search for "all complaints received by Staff regarding the current effective residential rate design" of Laclede Gas Company as requested by this data request. Staff objects to further responding to this data request ("DR") on the grounds that the DR is (1) vague and ambiguous; (2) unduly burdensome and overly broad; (3) irrelevant; and (4) seeks personally identifiable customer information protected from disclosure pursuant to Section 386.480, RSMo.

5. Staff is additionally concerned by this request as it asks for copies of consumer complaints, which bear the private information of LAC and MGE customers. Staff is prohibited by Section 386.480, RSMo, from divulging any non-public information it receives from corporations, persons or public utilities. Responding to DE's request would directly violate that prohibition.

**WHEREFORE**, Staff prays that the Commission will permit Staff to object to DR DED-DE 206 out-of-time, to be discussed at the scheduled discovery conference on August 9, 2017; and grant such other and further relief as is just in the circumstances.

Respectfully submitted,

**/s/ Mark Johnson**

Mark Johnson  
Senior Counsel  
Attorney for Staff of the  
Missouri Public Service Commission  
Missouri Bar No. 64940  
P. O. Box 360  
Jefferson City, MO 65102  
(573) 751-7431 (Telephone)  
(573) 751-9285 (Fax)  
[mark.johnson@psc.mo.gov](mailto:mark.johnson@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 8<sup>th</sup> day of August, 2017.

**/s/ Mark Johnson**