

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

In the Matter of Laclede Gas Company's Request to Increase Its Revenue for Gas Service))	<u>File No. GR-2017-0215</u>
In the Matter of Laclede Gas Company d/b/a Missouri Gas Energy's Request to Increase Its Revenues for Gas Service)))	<u>File No. GR-2017-0216</u>

STAFF'S NOTICE OF RESOLUTION OF DISCOVERY DISPUTE

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Notice* hereby respectfully states:

1. Staff filed a *Motion to Compel Discovery and Motion for Discovery Conference* on August 4, 2017, stating several outstanding data requests ("DR") and other discovery issues occurring in the course of this proceeding. Since the filing of that *Motion* counsel for Laclede Gas Company ("LAC") and Laclede Gas Company d/b/a Missouri Gas Energy ("MGE") has reached out to Staff in an attempt to resolve the issues contained in the *Motion*. At this time, Staff's immediate discovery concerns addressed in its *Motion* have been resolved, or a process has been identified to address remaining discovery and a discovery conference in regards to these purposes is unnecessary at this time.

2. To date Staff has received nearly all of the DR responses outlined in its *Motion* and the Company has assured Staff it will receive the remaining outstanding responses listed in the *Motion* by August 11, 2017. Additionally, the Company has assured Staff it will provide the updated information and formal written responses requested in the *Motion* in a timely fashion. Staff appreciates these efforts by the Company.

3. Staff continues to have concerns regarding the delay in receiving previous DR responses and certain DRs which have come due since the filing of Staff's *Motion* and remain unanswered. Additionally, Staff has ongoing concerns with the quality of DR responses and the sufficiency of the responses to the questions being asked. The Company has assured Staff that it will work to resolve content-related issues in DR responses on a personal basis with Staff counsel and witnesses.

WHEREFORE, Staff requests the Commission withdraw Staff's *Motion to Compel* from the matters at issue for the discovery conference scheduled August 9, 2017; and grant such other and further relief as is appropriate under the circumstances.

Respectfully submitted,

/s/ Whitney Payne

Whitney Payne
Legal Counsel
Missouri Bar No. 64078
P. O. Box 360
Jefferson City, MO 65102
(573) 751-8706 (Telephone)
(573) 751-9285 (Fax)
whitney.payne@psc.mo.gov

/s/ Mark Johnson

Mark Johnson
Senior Counsel
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

Attorneys for the Staff of the
Missouri Public Service Commission

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was served electronically, or hand-delivered, or via First Class United States Mail, postage prepaid, on all parties of record herein on this 8th day of August, 2017.

/s/ Whitney Payne