Exhibit No.: Issue:

Witness:

Case No.:

Sponsoring Party: Type of Exhibit:

Date Testimony Prepared:

Accounting Schedules, Rate Base, Plant in Service, Adjustments to Plant in Service, Depreciation Reserve, Cash Working Capital, Interest on IFP & EWP, Depreciation Expense, Cost of Removal, Advertising, Postage Expense, Property Taxes, MO Franchise Taxes, Postage Expenses, Regulatory Expenses, **Outside Services** Paula Mapeka MoPSC Staff Direct testimony GR-2007-0208

MISSOURI PUBLIC SERVICE COMMISSION

UTILITY SERVICES DIVISION

DIRECT TESTIMONY

OF

PAULA MAPEKA

LACLEDE GAS COMPANY

CASE NO. GR-2007-0208

Jefferson City, Missouri May 2007

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Laclede Gas Company's Tariff to) Revise Natural Gas Rate Schedules)

Case No. GR-2007-0208

AFFIDAVIT OF PAULA MAPEKA

STATE OF MISSOURI)) ss. COUNTY OF COLE)

.

Paula Mapeka, of lawful age, on her oath states: that she has participated in the preparation of the foregoing Direct Testimony in question and answer form, consisting of pages to be presented in the above case; that the answers in the foregoing Direct Testimony were given by her; that she has knowledge of the matters set forth in such answers; and that such matters are true and correct to the best of her knowledge and belief.

Patila Mapeka

Subscribed and swom to before me thisday of

NOTARY C

ASHLEY M. HARRISON My Commission Expires August 31, 2010 Cole County Commission #06693973

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1		DIRECT TESTIMONY
2		OF
3		PAULA MAPEKA
4		LACLEDE GAS COMPANY
5		CASE NO. GR-2007-0208
6	Q.	Please state your name and business address.
7	A.	My name is Paula Mapeka. My business address is Governor Office Building,
8	Suite 440, 20	00 Madison Street, Jefferson City, MO 65102.
9	Q.	By whom are you employed and in what capacity?
10	A.	I am a Utility Regulatory Auditor with the Missouri Public Service
11	Commission	(Commission or PSC).
12	Q.	Please describe your educational background.
13	A.	I graduated with a Masters degree in Business Administration (MBA) from
14	Lincoln Univ	versity, Jefferson City, Missouri in August 2005. I attained a Bachelor of Science
15	degree in Ac	counting from Lincoln University in May 2004.
16	Q.	Please describe your employment history.
17	A.	Prior to employment with the Commission, I was employed by the Department
18	of Health and	d Senior Services. I assumed my current position as a Utility Regulatory Auditor
19	with the Con	nmission in March 2006.
20	Q.	What are your responsibilities with the Commission?
21	A.	I am responsible for assisting in the audits and examinations of the books and
22	records of reg	gulated utility companies operating within the state of Missouri.

Q. 1 What knowledge, skill, experience, training or education do you have in these 2 matters?

3

In addition to my MBA and degree in Accounting, I have acquired knowledge A. 4 of the audit topics assigned to me through the review of the Staff's testimony and workpapers 5 from previous rate cases involving Laclede Gas Company (Laclede or Company), as well as 6 materials from rate cases filed by other Missouri jurisdictional utilities. I have reviewed in-7 house training materials on the topics assigned to me in this proceeding. I have also reviewed 8 prior Commission decisions regarding these areas. I have reviewed the Company's 9 testimony, workpapers and responses to the Staff's data requests addressing these topics. My 10 immediate supervisor and other senior auditors have provided guidance and training in these 11 areas and oversight of my work.

12

13

Q. Did you make an examination and analysis of the books and records of Laclede in regard to issues raised in this case?

14 Yes, in conjunction with other members of the Commission Staff (Staff), I A. 15 specifically examined and analyzed the following documentation: the Company's filed 16 testimony, the Company's responses to Staff data requests, general ledger information related 17 to my assigned issues and Company workpapers.

18

Q. Have you previously filed testimony before this Commission?

19 Yes, I filed testimony in Case No. ER-2006-0315, The Empire District Electric Α. 20 Company; and Case No. GR-2006-0422, Missouri Gas Energy. A listing of the issues I 21 addressed in testimony in those cases can be found in Schedule 1, attached to my Direct 22 testimony.

1	EXECUTIV	E SUMMARY				
2	Q. Please give a brief summary of your Direct testimony in this case.					
3	A.	The purpose of this Direct t	estimony is to address Staff's proposed treatment			
4	of various rat	of various rate base items in this case, including plant in service, depreciation reserve and				
5	cash working	capital.				
6	The S	Staff's income statement adju	stments supported within this testimony include			
7	advertising, p	property taxes, Missouri franch	nise taxes, amortization expenses, rents and leases,			
8	cost of remov	val, PSC assessment, rate case	expenses and lockbox fees.			
9	Each	of these items will be discusse	d in turn in my testimony.			
10	Q.	What Staff accounting sched	ules and adjustments are you sponsoring?			
11	А.	I am sponsoring the following	g accounting schedules:			
12		Accounting Schedule	Description			
13		Schedule 2	Rate Base			
14		Schedule 3	Plant in Service			
15		Schedule 4	Adjustments to Plant in Service			
16		Schedule 5	Depreciation Reserve			
17		Schedule 6	Adjustments to Depreciation Reserve			
18		Schedule 7	Depreciation Expense			
19		Schedule 8	Cash Working Capital			
20	Q.	What adjustments are you sp	oonsoring?			
21	А.	I am sponsoring the following	g Income Statement adjustments:			
22		Insulation Financing Income	: S-7.1			
23		Energy Wise Financing Inco	me: S-7.2			
24		Depreciation Expenses:	S-17.1			

1	(Cost of Removal:	S-12.3
2	I	Advertising:	S-15.3 & S-16.12
3	F	Postage Expense:	S-13.4
4	F	Rents and Leases:	S-16.17
5	ŀ	Amortization Expenses:	S-18.1
6	F	Property Taxes:	S-19.3
7	Ν	MO Franchise Taxes:	S-19.5
8	F	PSC Assessment:	S-16.14
9	F	Rate Case Expenses:	S-16.16
10	(Dutside Services	S-16.22

RATE BASE

Q.

12

11

Please describe Accounting Schedule 2, Rate Base.

This Accounting Schedule represents the investment upon which the Company 13 A. 14 is allowed to earn a rate of return. This Accounting Schedule includes the Company's 15 adjusted jurisdictional plant in service balance from Accounting Schedule 3, Total Plant in 16 Service, and deducts the Company's adjusted jurisdictional depreciation reserve (Accounting 17 Schedule 6) to compute the net plant in service amount. Added to net plant in service are 18 amounts for cash working capital, materials and supplies, prepayments and prepaid pension 19 asset. Rate base deductions include the federal income tax offset, state income tax offset, 20 interest expense offset, customer advances for construction, customer deposits and deferred 21 income taxes. The mathematical total of these items is the rate base amount incorporated in 22 the gross revenue requirement recommendation shown on Accounting Schedule 1, Revenue 23 Requirement.

Q.

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1

MATERIALS AND SUPPLIES

2

What are materials and supplies?

A. These are small dollar assets intended for use in the utility business for
construction, operation and maintenance activities. Materials and supplies are stored in
inventory by the utility and are dispensed as needed.

6

Please describe the Staff's treatment of materials and supplies.

A. The Staff used a 13-month average balance method ending March 31, 2007, to
normalize or smooth out variations for purposes of determining the value of materials and
supplies to include in rate base. March 31, 2007, is the endpoint of the Staff's test year update
period in this proceeding.

11 PREPAYMENTS

12

Q. What are prepayments?

A. These are goods or services a company pays for in advance of their intended
use in order to obtain the goods or services for the utility to carry out its normal operations.
Such items include, but are not limited to, insurance, taxes, rents, interest and other
miscellaneous items.

17

Q. Please describe the Staff's treatment of prepayments.

A. As there were variations or fluctuations in the balances of Laclede's
prepayment accounts throughout the audit period, the Staff used a 13-month average balance
method for the period ending March 31, 2007, to normalize or smooth out these variations for
purposes of determining the value of prepayments to include in rate base.

SPECIAL DEPOSISTS

2

1

Q. What are special deposits and how are they treated for rate purposes?

A. These are amounts paid to municipalities or counties that are required before
Laclede can begin construction activities on city or county land. The special deposits amount
in rate base is the balance at March 31, 2007.

6

INSULATION FINANCING AND ENERGY WISE PROGRAMS

Q. What are the Insulation Financing Program (IFP) and the Energy Wise
Programs (EWP) and how are they treated for rate purposes?

9 A. These are programs whereby Laclede will provide its customers with financing
10 through interest-bearing loans to make improvements to their properties in order to achieve
11 greater energy conservation.

The Staff used the balance as of March 31, 2007, for the EWP as representative on a forward going basis, in relation to the upward trend in the EWP monthly balances. The Staff used a 13-month average balance ending March 31, 2007, for the IFP to normalize or smooth out these variations for purposes of determining the value to include in rate base.

16

17

INTEREST REVENUE FOR LOAN PROGRAMS

Q. Please explain Income Statement adjustments S-7.1 and S-7.2.

A. Adjustments S-7.1 and S-7.2 include interest revenue for Laclede's IFP and EWP. The IFP currently permits a residential customer to borrow up to \$2,000 from Laclede at a 3% annual rate for the purpose of insulating their home. The EWP allows a 7.5% annual rate to commercial and residential customers for heating/cooling appliance equipment package purchases.

Q.

1

CUSTOMER ADVANCES

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9

Please describe the customer advances amount that is deducted from rate base.

A. Customer advances are funds provided by customers to cover certain specific costs incurred by the Company on behalf of these customers. These funds represent interest free money to the Company; therefore, it is appropriate to include the funds as an offset to rate base. The customer advances amount in rate bate is the balance at March 31, 2007.

PLANT IN SERVICE

Q. Please discuss Accounting Schedule 3, Plant In Service, and Accounting Schedule 4, Adjustments to Plant In Service.

A. Accounting Schedule 3, Plant In Service, provide the detail for the Staff's
utility gas plant in service rate base component. The adjustments on Accounting Schedule 4,
Adjustments to Plant in Service, are sponsored by Staff Auditing witness Kimberly K. Bolin.

13

DEPRECIATION RESERVE

Q.

14

Please discuss the accounting schedules supporting depreciation reserve.

A. Accounting Schedule 5, Depreciation Reserve, provides the detail of the
accumulated depreciation related to the plant balances on Accounting Schedule 3. The
purpose of Accounting Schedule 6, Adjustments to Depreciation Reserve, is to provide the
detail of any adjustments made to the depreciation reserve. The Staff adjustments to the
depreciation reserve on Accounting Schedule 6 are sponsored by Staff Auditing witness Mark
L. Oligschlaeger and Kimberly K. Bolin.

21 DEPRECIATION EXPENSE

22

Q. Please explain Accounting Schedule 7, Depreciation Expense.

A. This Accounting Schedule calculates the annual depreciation expense applied
 to the Company's plant in service. Column D contains the depreciation rates approved for the
 Company by the Commission in Laclede's last rate proceeding, Case No. GR-2005-0284.
 The rates in Column D are then applied to the plant balances in Column C to determine the
 annualized level of depreciation expense that appear in Column E.

COST OF REMOVAL

Q.

7

6

Please explain Income Statement adjustment S-12.3

A. Adjustment S-12.3 adjusts the actual cost of removal amount expensed by the
Company in the test year in account 874.200. This adjustment is appropriate because, per
past Commission Orders, cost of removal is no longer treated as an expense for ratemaking
purposes, but is now treated as a component of depreciation expense.

12

13

CASH WORKING CAPITAL

- Q. What is cash working capital (CWC)?
- A. CWC is the amount of cash necessary for the Company to pay the day-to-day
 expenses incurred to provide gas service to Laclede's customers.
- 16

Q. Where are the results of the Staff's CWC analysis?

- A. The results of the Staff's CWC analysis can be found on Accounting
 Schedule 8, Cash Working Capital.
- 19

20

Q. Is the method you used to calculate Laclede's CWC requirement the same method the Staff has used in previous rate cases?

- A. Yes, the method has been used by the Staff and adopted by the Commission in
 numerous rate proceedings dating back to the 1970s, including the Company's most recent
 rate cases.
 - Q. How did the Staff determine the CWC requirement?
 - A. The Staff calculated the CWC requirement by performing a lead/lag study.
 - Q. What is the purpose of a lead/lag study?

7 The lead/lag study determines the amount of cash that is necessary on a day-to-A. 8 day basis in order for Laclede to provide service to its ratepayers. The lead/lag study analyzes 9 the cash flows related to the payments received from the Company's customers for the 10 provision of service and the disbursements made by the Company to its suppliers and vendors 11 for goods and services necessary to provide gas service. The lead/lag study takes into account 12 the number of days it takes Laclede to make payments after receiving goods or services from 13 a vendor, compared with the number of days it takes the Company to receive payments for the 14 gas service provided to its customers. A lead/lag study also determines who provides CWC.

15

Q.

Q.

4

5

6

What are the sources of CWC?

A. The shareholders and the ratepayers are the sources of CWC.

17

16

Q. How do the shareholders supply CWC?

A. When Laclede spends cash to pay for an expense before the ratepayer provides
the cash, the shareholders are the source of the funds. This cash represents a portion of the
shareholders' total investment in the Company. The shareholders are compensated for the
CWC funds by the inclusion of these funds in the rate base, thereby providing a return on
their investment.

- 23
- How do the ratepayers provide CWC?

Q.

A.

A. Ratepayers supply CWC when they pay for the gas service received before
 Laclede pays for expenses incurred in providing that service. The ratepayers are compensated
 for the funds supplied through a reduction to rate base by the amount of CWC the ratepayers
 provide.

5

How should lead/lag studies be interpreted?

A. A positive CWC requirement indicates that in the aggregate, the shareholders
provide the CWC for the test year. This also means that, on the average, the Company paid
the expenses incurred to provide the gas service to the ratepayers before the ratepayers in turn
paid for that service.

10 A negative CWC requirement indicates that, in the aggregate, the ratepayers provide 11 the cash working capital during the test year. This means that, on average, the ratepayers paid 12 for their gas service before the Company paid the expense incurred to provide that service.

Q. Please explain the components of the Staff's calculation of CWC, which
appear on Accounting Schedule 8, Cash Working Capital.

15

16

17

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19

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23

The components of the Staff's calculation are as follows:

 Column A (Account Description): lists the types of cash expenses which the Company pays on a day-to-day basis.

2) Column B (Test Year Expenses): provides the amount of annualized expense included in the cost of service. It shows the dollars associated with the items listed in Column A on an adjusted Missouri jurisdictional basis.

 Column C (Revenue Lag): indicates the number of days between the midpoint of the provision of service by the Company and the payment

1			for the service by the ratepayer. The revenue lag addressed in this case
2			is explained later in this Direct testimony.
3	2	4)	Column D (Expense Lag): indicates the number of days between the
4			receipt of and the payment for, the goods and services (i.e., cash
5			expenditures) used to provide service to the ratepayer. The expense
6			lags addressed in this case are discussed later in this Direct testimony.
7		5)	Column E (Net Lag): results from the subtraction of the Expense Lag
8			(Column D) from the Revenue Lag (Column C).
9	(6)	Column F (Factor): expresses the net lag in days as a fraction of the
10			total days in the test year. This is accomplished by dividing the net lags
11			in Column E by 365.
12	7	7)	Column G (CWC Requirement): represents the average amount of cash
13			necessary to provide service to the ratepayer. This is computed by
14			multiplying the annualized amount in the Test Year Expenses (Column
15			B) by the CWC Factor (Column F).
16	Q. I	Please	describe the revenue lag.
17	A. 7	The re	venue lag is the amount of time from when the Company provides the
18	service to when	n it rec	eives payment from the ratepayers for that service. The overall revenue
19	lag in this case	is the s	sum of three subcomponent lags. They are the following:
20	1	1)	Usage Lag: The midpoint of the average time elapsed from the
21			beginning of the first day of a service period through the last day of that
22			service period.

ï			
1		2) Billing Lag: The period of time between the end of	the last day of a
2		service period and the day the bill is placed in the mail	by a utility.
3		3) Collection Lag: The period of time between the day	the bill is placed
4		in the mail by a utility and the day the utility receives	payment from the
5		ratepayer for services performed.	
6	The S	taff's subcomponent calculations and overall revenue results are	e as follows:
7 8		<u>Staff</u>	
o 9		Usage Lag 15.21 days	
10		Billing Lag 3.17 days	
11 12		Collection Lag28.70 daysTotal47.08 days	
12		Total 47.08 days	
13	Q.	Please explain how the usage lag was determined.	
14	А.	The usage lag was determined by dividing the number of day	s in a typical year
15	(365) by the 1	number of months in a year (12) to yield the average number o	f days in a month
16	(30.42). This	30.42 total was then divided by two to yield an average usage	lag of 15.21 days.
17	Two was use	d as the divisor since the Company bills monthly; the Staff as	ssumed service is
18	delivered to the	he customer evenly throughout the month.	
19	Q.	Please explain how the Staff determined its billing lag recomm	nendation.
20	А.	The Staff is using the billing lag first used for Lacle	de in Case No.
21	GR-2002-356	6, which was determined by analyzing the number of days betwee	een the end of the
22	service period	d and the day that the bill was mailed.	
23	Q.	Please explain the Staff's approach to determining the collection	on lag.
24	А.	The collection lag is the average number of days that elapse	between the day
25	that the bill w	vas mailed and the day the Company receives payment for that	bill. As its basis

Q.

1 for the collection lag, the Staff used an accounts receivable turnover calculation used by 2 Laclede in its last rate proceeding, Case No. GR-2005-0284.

3

What is an accounts receivable turnover calculation?

4 A. An accounts receivable turnover calculation is a methodology used to ascertain 5 the lag days associated with the collection period. Under this method, a utility's average 6 accounts receivable balance for a period of time (in this case, a year), are divided by the 7 average sales totals for the same period of time. The result is the number of days a customer 8 bill remains in the utility's accounts receivable balance before being collected by the utility. 9 As such, the results of an accounts receivable turnover calculation are a proxy for a utility's 10 collection lag.

11

Q. Did the Staff accept in entirety the results of Laclede's turnover calculation for purposes of calculating the Company's collection lag? 12

13 A. No. The Staff adjusted the Company's accounts receivable turnover results by 14 removing bad debt write-offs from the daily accounts receivable balances contained within 15 Laclede's GR-2005-0284 calculation. The Staff subtracted the preceding ten months of bad debt write-offs from each monthly average daily accounts receivable amount. This is in 16 17 conjunction with page 8, of James A. Fallert's, Direct testimony in this proceeding where he 18 indicated, "There is generally a ten-month lag between the revenue period when the customer 19 is rendered service and the period when the customer's account will be written off."

20

21

Q. Why did the Staff remove the actual bad debt write-off from the average daily accounts receivable balances?

A. Bad debt write-offs represent the amount of billings that the Company will
 never recover from customers. Bad debt expense is a non-cash expense and, therefore, should
 not be considered in a lead/lag analysis.

4

Q. What expense lags did the Staff calculate in this case?

A. The Staff has continued to use the following expense lags it calculated in Laclede's rate proceeding, Case No. GR-2002-356, for purposes of this audit: natural gas, payroll and tax withholdings, group insurance, 401K contributions, pension and benefits, materials and supplies, transport expense, postage expense, PSC assessment, rent, cash vouchers, bad debts, payroll taxes, Missouri franchise taxes, gross receipts taxes, property taxes, sales taxes, the Staff is not aware of any reasons why these expense lags would have materially changed since Case No. GR-2002-0356.

12

Q. Please explain the expense lags for purchased gas.

A. The expense lag for purchased gas is the time elapsed between the midpoint of
the period when Laclede receives the gas from suppliers and the date on which payments for
such gas are due.

16

Q.

Q.

Please explain the base payroll expense lags.

A. The base payroll expense lag is the time elapsed between the midpoint of the
period in which employees earn wages and the date the wages are paid by Laclede. The base
payroll expense lags are comprised of non-contract and contract employee lags.

20

What is the basis for the expense lag days assigned to tax withholdings?

A. The tax withholding expense lag was based on the federal tax withholding,
state tax withholding, city tax withholding and FICA (social security/Medicare) tax
withholding. The withholding lag days were based upon the same periods used for base

payroll. The respective lag day computations considered the time-lapse between the average
 date the respective payroll was earned and the tax due dates.

3

Q. Please explain the expense lag calculation for 401(k) contributions.

A. The expense lag for the 401(k) contributions are based on the same payroll
periods as base payroll; the time elapsed between the midpoint of the period in which
employees earn wages and the date the benefits are paid by Laclede.

Q. Please explain the Staff's calculation of Laclede's pensions and benefits
expense lags.

9 A. The pensions and benefits line item within the CWC Accounting Schedule
10 represents the time elapsed between the midpoint of the period of service and the date on
11 which payments are due.

12

Q. Please explain how the expense lag for group insurance was calculated.

A. The lag for group insurance was computed using data provided in Laclede's
response to Staff Data Request No. 123 from Case No. GR-2002-356, which included actual
amounts and dates paid and service periods to which the payments pertained.

16

Q.

Please explain the treatment of the expense lag for materials and supplies.

A. Materials and supplies are already included in the rate base calculation because
the utility pays for these items in advance of their use in order to provide service. Applying a
net lag to the test year expenses associated with materials and supplies would, in essence,
count it twice in the Staff's overall calculation of revenue requirement. The Staff has
assigned an expense lag equal to the revenue lag for this item in order to produce a zero CWC
effect.

Q.

Q. Please explain the expense lags for transportation, postage and cash vouchers
 expenses.

A. The transportation, postage expense and cash vouchers lags represent the amount of time elapsed between the receipt of and payment for goods and services necessary to provide service to ratepayers. The data used to compute the lags included actual amounts and dates of payments, as well as the service periods to which they pertained. The cash vouchers line item is designed to include all operation and maintenance (O&M) expenses within the study that are not specifically analyzed in a separate line item.

9

Please explain the expense lag for rent expense

A. The rent expense lag was calculated using dates paid and service periods to
which the payments applied. Calculations were based on the number of days from the invoice
date to the date the invoice was paid.

13

Q. Please explain the expense lag for bad debts/uncollectible accounts.

A. Uncollectible are an expense in name only. This expense actually represents a
failure to collect revenue owed to Laclede, and, therefore, it does not involve a cash flow
impact related to payment of an expense. An expense lag equal to the revenue lag has been
assigned to this item so that a zero CWC impact is produced.

18

Q. Please explain the expense lag for the employer's portion of FICA taxes.

A. The employer's portion of FICA (social security) taxes is the amount of taxes
paid by the employer on payroll paid to the employees. The expense lag for employer's
portion of FICA is computed as the period of time between the midpoint of the pay period for
which the taxes are withheld, and the date the tax withholdings must be paid to the taxing
authorities.

Q.

1

Q. Please explain the expense lag for federal and state unemployment taxes.

2 A. The expense lags for federal and state unemployment taxes represent the length 3 of time between the average date services are rendered by the employee and the date Laclede 4 pays the tax associated with that service.

5

Please explain the expense lag for Missouri corporate franchise tax.

6 A. Corporation franchise taxes are paid annually. The expense lag considers the 7 time elapsed between the midpoint of the taxable period (a calendar year) and the statutory 8 due date.

9 Q. Please explain the expense lag for gross receipts taxes on Accounting 10 Schedule 8 at Line 15.

11 Gross receipts taxes are paid based upon the individual payment requirements A. 12 of the municipal taxing entities. The Staff calculated an expense lag of 47.08 days.

13

Q. Why does the revenue lag depicted on Accounting Schedule 8 for sales tax and gross receipts taxes differ from the revenue lag calculation of 47.08 days you discussed 14 15 above?

16 A. Laclede acts as an agent of the taxing authority in collecting sales and use 17 taxes and gross receipts taxes from the ratepayer and in paying the proper institution on a 18 timely basis. Laclede does not provide any service to the ratepayers associated with these 19 taxes. Since the expense lags for gross receipts taxes is measured from the date of billing, the 20 revenue lag equals only the period of time required to collect revenues. The revenue lag 21 associated with gross receipt taxes, as well as sales and use taxes, was calculated to be 28.70 22 days.

23

Q.

Please explain the expense lag for property taxes.

A. The property tax lag days were calculated by using the midpoint of the service
 period (a calendar year) and the required due date for property taxes paid by Laclede.

3

Q. Please explain the sales taxes expense lag.

A. The expense lag for sales taxes take into consideration the time elapsed
between the midpoint of the taxable month and the date sales tax was paid to the state of
Missouri.

Q. Please identify any other components of CWC that do not directly appear in
8 the Staff's Accounting Schedule 8.

9 A. The federal income tax offset, state income tax offset and interest expense 10 offset line items do not directly appear in the Accounting Schedule 8, Cash Working Capital. 11 These items appear as separate line items in the Staff's Accounting Schedule 2, Rate Base. 12 These cash payments are known and certain obligations of Laclede with payment periods and 13 payment dates established by statute or bond indentures. The Staff believes amounts 14 collected from ratepayers, which the Company intends to use for the payment of taxes and 15 interest, represent a source of cash for Laclede which has use of such funds until they are 16 passed on to the appropriate taxing authority or bondholder. The Staff believes it is 17 appropriate to include taxes and interest as offsets in a lead/lag analysis.

Q. Why are the federal income tax offset, state income tax offset and interest
expense offsets included in the Staff's Accounting Schedule 2, Rate Base, rather than
Accounting Schedule 8, Cash Working Capital?

A. The expense component used for these offsets is tied directly to the mechanical
 computation of the revenue requirement. The Staff's computer-generated revenue
 requirement is based on a computer program with the capability of extracting appropriate

Q.

Q.

amounts for federal income tax, state income tax and interest expense based on amounts
 obtained from Accounting Schedule 11, Income Tax. The computer program applies the
 CWC factor for each respective component and places the CWC revenue requirement directly
 in Accounting Schedule 2.

5

Please explain the Staff's federal and state income tax offset recommendations.

A. The federal and state income tax offsets represent the period of time between
the midpoint of the taxable period (a calendar year) and the required dates taxes are due to the
federal and state taxing authorities. Currently, 100% of the estimated federal tax must be paid
during the year in four quarterly installments, which are due by the 15th day of April, July,
October and January. The same due dates apply to state income taxes.

11

Please explain the interest expense offset.

A. The interest expense lag is computed by determining the time elapsed between the midpoint of the interest period and the required due date for the payment of interest on long-term debt. The Staff then calculated a dollar-weighted average to derive an overall interest expense lag of 90.93 days. This expense lag was subtracted from the revenue lag and then divided by 365 days to determine the CWC factor used for calculating the interest offset appearing on Accounting Schedule 2, Rate Base.

18

Q. What was the result of the Staff's lead/lag calculation?

A. The aggregate of the individual calculations, including the offsets for interest
and income taxes, result in total net shareholder-supplied funds and illustrate the excess of
CWC supplied by the shareholders over the amount supplied by the ratepayers.

22 ADVERTISING EXPENSES

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Q. Please explain adjustment S-15.3 and S-16.12.

1	А.	Adjustments S-15.3 and S-16.12 disallow certain advertising costs incurred by
2	the Company.	

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Q. Please describe the history of such adjustments before the Commission.

A. As part of <u>RE: *Kansas City Power and Light Company*</u>, 28 Mo. P.S.C. (N.S.)
228 (1986) (hereinafter *KCPL*), the Commission adopted an approach that classifies
advertisements into five categories and provides separate rate treatment for each category.
The five categories of advertisements adopted by the Commission for purposes of this
approach are:

- 9
 1. <u>General</u> informational advertising that is useful in the provision of
 adequate service;
- 11 2. <u>Safety</u> advertising which conveys the ways to use the Company's
 12 service safely and to avoid accidents;
- 13 3. <u>Promotional</u> advertising used to encourage or to promote the use of
 14 the particular commodity the utility is selling;
- 15 4. <u>Institutional</u> advertising used to improve the Company's public
 16 image; and
 - 5. <u>Political</u> advertising which is associated with political issues.

The Commission adopted these categories of advertisements because it believed that a utility's revenue requirement should include the reasonable and necessary cost of general and safety advertisements, but should disallow the cost of institutional or political advertisements, and only include the cost of promotional advertisements to the extent that the utility can provide cost justification for the advertisement (*Ibid.*, pp. 269-271).

Q. Did the Staff use the KCPL standard to evaluate the Company's advertising
 expense in this case?

A. Yes, the Staff utilized the standards as initially established in the *KCPL* case and in subsequent cases, to determine the test year level of allowable advertising expense for the general, safety, institutional, promotional and political advertising categories. The Staff proposes to disallow advertisements that are institutional, promotional or unrelated to the natural gas industry. The Staff proposes to allow all general and safety-related advertisements to the extent that they are related to the natural gas industry and beneficial to Missouri ratepayers.

Q. How did you apply the standard established in the *KCPL* case to your
examination of advertising expense in this case?

A. I categorized all of the Company's advertisements on an ad-by-ad basis using the *KCPL* standard to determine the amount to be allowed or disallowed. The Staff reviewed each advertisement to determine which of the following primary messages the advertisement was designed to communicate:

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1. the promotion of a service or product (Promotional);

- the dissemination of information necessary to obtain safe and adequate electric service (General and Safety);
- 3. the promotion of the Company image (Institutional); or
- the endorsement of a political candidate or any political message (Political).

Q.

Q.

Schedule 2, attached to this testimony, shows Staff's itemized analysis of the
 Company's advertising costs and a copy of Laclede's advertisements that Staff proposed for
 disallowance as being promotional or institutional in nature.

4

How did the Staff develop its advertising adjustments?

A. The Staff requested that the Company supply the cost of all advertisements.
Based on its categorization, the Staff disallowed the expense associated with advertisements
that it classified as institutional or promotional. The Staff also extracted and disallowed the
costs associated with the portions of Laclede's institutional advertisements that were on the
same page as its general advertisements.

10

Describe the institutional advertisements that the Staff disallowed.

A. Institutional advertising is designed to enhance the Company's public image. The Staff asserts that this form of advertising is not necessary for the Company to provide safe and adequate service and, therefore, should not be included in the cost of service. The Staff believes that this type of image enhancement advertising only serves to benefit the shareholders of the utility. The Staff has classified the 'Part of the Family' advertisements as being institutional. These advertisements can be found attached to Staff's testimony under Schedule 2.

18

Q. Describe the promotional advertisements that the Staff disallowed.

A. The Staff disallowed advertisements entitled 'Art of Cooking' and 'At
moments like this'. The Staff removed these advertisements as the Company did not provide
the Staff with cost justification for promotional advertising on an advertisement by
advertisement basis or even on an advertisement campaign basis. These advertisements can
be found attached to Staff's Direct testimony under Schedule 2.

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POSTAGE EXPENSES

- Q. Please describe the Staff's postage expense annualization, adjustment S-13.4.
- A. Adjustment S-13.4 reflects the increase on postal rates which became effective
- 4 January 2006 and the increase that will be effective on May 14, 2007.

AMORTIZATION EXPENSE

- Q. Please explain adjustment S-18.1
- A. Adjustment S-18.1 annualizes the Company's booked amortization expenses.

8 **PROPERTY TAXES**

Q.

9

Please explain Adjustment S-19.3.

10 A. This adjustment annualizes property taxes using Laclede's December 2006
11 plant in service balances.

12 Q. Please explain how you calculated the Staff's property tax adjustment in this13 case.

A. The Staff's approach first calculates the ratio of Laclede's plant in service balance at January 1, 2006, to the assessment value placed upon that plant by taxing authorities, and then applies the ratio to Laclede's plant in service balance as of January 1, 2007.

18

Q. How are property taxes paid?

A. The state and local taxing authorities determine the annual property tax
payment through an assessment of utilities' real property. This assessment is made based
upon the utilities' property balances on January 1 of each year. The taxing authorities also
determine a property tax rate that is applied to the assessed values to compute the property tax

1	amount billed to utilities. The assessment values and property tax rates that will be applied to
2	Laclede's January 1, 2007, plant in service balances will not be known until later this year.
3	Q. When are property taxes paid by the utility?
4	A. The property taxes related to a utility's plant in service level at January 1 st of
5	each year are paid to the state and local taxing authorities at the end of each year, generally by
6	December 31 st .
7	MISSOURI FRANCHISE TAXES
8	Q. Please describe adjustment S-19.5
9	A. The Staff adjusted the test year amount of Missouri franchise tax to the actual
10	amount owed by Laclede to the state in January 2007.
11	<u>RENT EXPENSE</u>
12	Q. Please explain adjustment S-16.17.
13	A. Adjustment S-16.17 reflects the annualized rent expense amounts for the space
14	leased or rented by Laclede as reflected in the Company's response to Staff Data Request
15	No. 18.
16	RATE CASE EXPENSE
17	Q. Please describe adjustment S-16.16.
18	A. This adjustment normalizes rate case expense over a two-year period. The
19	total amount of rate case expense incurred by Laclede in this case through March 2007 is
20	being allowed at this time. The Staff considers all reasonably incurred expenses by utilities
21	seeking rate changes throughout the rate case process. This approach allows costs such as
22	consulting fees, employee travel expenditures and legal representation, which are directly

1 associated with the length of the case, to be properly included in this case. This adjustment 2 however, does not include those rate case expenses booked within the test year that are 3 associated with Laclede's previous case, Case No. GR-2005-0284, or any other rate case 4 proceeding. This exclusion is appropriate because the Staff's believes it is appropriate to 5 recommend recovery in rates of normalized rate case expense only on a prospective basis. 6 Staff believes it is inappropriate to allow specific recovery in rates of amounts related to past 7 rate proceedings.

8 The Staff will work with the Company through the duration of this case to establish a 9 reasonable and ongoing normalized level of rate case expense for inclusion in rates.

10 Q. Why is the Staff recommending that Laclede's rate case expenses be11 normalized over a two-year period?

A. Staff reviewed Laclede's recent rate case filing pattern (Case Nos.
GR-2007-0208, GR-2005-0284, GR-2002-356 and GR-2001-629) and determined that a twoyear normalization would be appropriate.

Q. Is the Staff recommending that Laclede's rate case expense associated with this
proceeding be amortized on the Company's books and records?

A. No. The Staff believes that the correct accounting for utilities is to book rate
case expenses in the period they are incurred.

19 PSC ASSESSMENT

Q.

20

Please discuss adjustment S-16.14 to annualize the PSC Assessment.

A. This adjustment represents the difference between the Staff's annualized PSC
Assessment and the test year recorded assessment expense. The most recent PSC
Assessment, in effect for the fiscal year July 1, 2006 to June 30, 2007, was used in the Staff's

annualization. The Staff will reflect the new July 1, 2007, PSC assessment in its proposed
 true-up audit in this case. The Staff's true-up recommendations can be found in the Direct
 testimony of Staff Witness Bolin.

4 OUTSIDE SERVICES

Q.

- 5
- Please describe Adjustment S-16.22

A. Independent (outside) contractors and vendors provided various services to
Laclede in the test year. We have requested further information from Laclede in Staff Data
Request No. 51.2 concerning some of the outside services costs incurred by Laclede. Pending
receipt of that information, the Staff has proposed disallowances of outside service fees
associated with the following vendors: Burroughs, Helper, Broom, Macdonald, Hebrank &
True; Scott Madden and The Vandiver Group. The Staff may withdraw these proposed
disallowances depending upon Laclede's data request response on this matter.

13

14

Q. Does this conclude your Direct testimony in this proceeding?

A. Yes, it does.

CASE PARTICIPATION OF PAULA MAPEKA

	Schedule 1							
Date Filed	Issue	Case Number	Exhibit	Case Name				
06/23/2006	Postage Expenses, Property and Liability Insurance, Injuries and Damages & Worker's Compensation, Customer Deposits, PSC Assessment, Rate Case Expense, Customer Advances, Material & Supplies,	ER20060315	Direct	The Empire District Electric Company				
10/12/2006	Miscellaneous Expenses, Insurance, Postage, Property Taxes, Regulatory Expenses, Dues & Donations, Accounting Schedules, Promotional Giveaways, Other Ratebase Issues, Advertising, Depreciation Expense, Inquiries & Damages, Interest on Customer Deposits, Case Working Capital, Depreciation Reserve, Plant in Service	GR20060422	Direct	Missouri Gas Energy				
11/21/2006	Cash Working Capital, Software Amortization	GR20060422	Rebuttal	Missouri Gas Energy				

LACLEDE GAS COMPANY Case No. GR-2007-0208 Source: DR 48 Staff: P Mapeka

J

ID#	MEDIA	AD/COMMERCIAL	TOTAL	913.10	913.30	909.00	921.03	
1	PRINT	At moments like this (Cooking)	\$5,360.00			· · · · · · · · · · · · · · · · · · ·	\$5,360.00	Institutional
2	PRINT	At moments like this (Bathtub)	\$7,920.00				\$7,920.00	Institutional
3	PRINT	At moments like this (Pateo)	\$13,440.00		····		\$13,440.00	Institutional
4	PRINT	At moments like this (Fireplace)	\$5,940.00		*		\$5,940.00	Institutional
5	PRINT	Art of Cooking	\$1,075.00	\$1,075.00				Promotional
6	PRINT	Follow Your Nose	\$20,611.65			20,611.65		Safety
7	PRINT	Elderly & Disabled	\$14,942.73			\$14,942.73		Beneficial information
8	PRINT	Safety Tips	\$21,420.45			\$21,420.45		Safety
9	PRINT	Part of the Family(Family Shot)	\$4,655.00		\$4,655.00			Hatf informational/safety 10/14 institutional
10	PRINT	Part of the Family(Bridal Shot)	\$1,125.00	-	\$1,125.00			Institutional
11	RADIO	Winter Campaign	\$99,680.00		·····		\$99,680.00	general/Informational
<u></u>		e and an and the second se			<u></u>			<u> Banang Ang</u>
		TOTAL	\$196,169.83	\$1,075.00	\$5,780.00	\$56,974.83	\$132,340.00	
		Disallowed	\$36,190.00	\$1,075.00	\$ 2,455.00	0	\$32,660.00	
		Annualized amounts	\$159,979.83	\$0.00	\$3,325.00	\$56,974.83	\$99,680.00	
		Adjustment		(1,075.00)	(2,455.00)	0.00	(\$32,660.00)	

Prepared

Printed

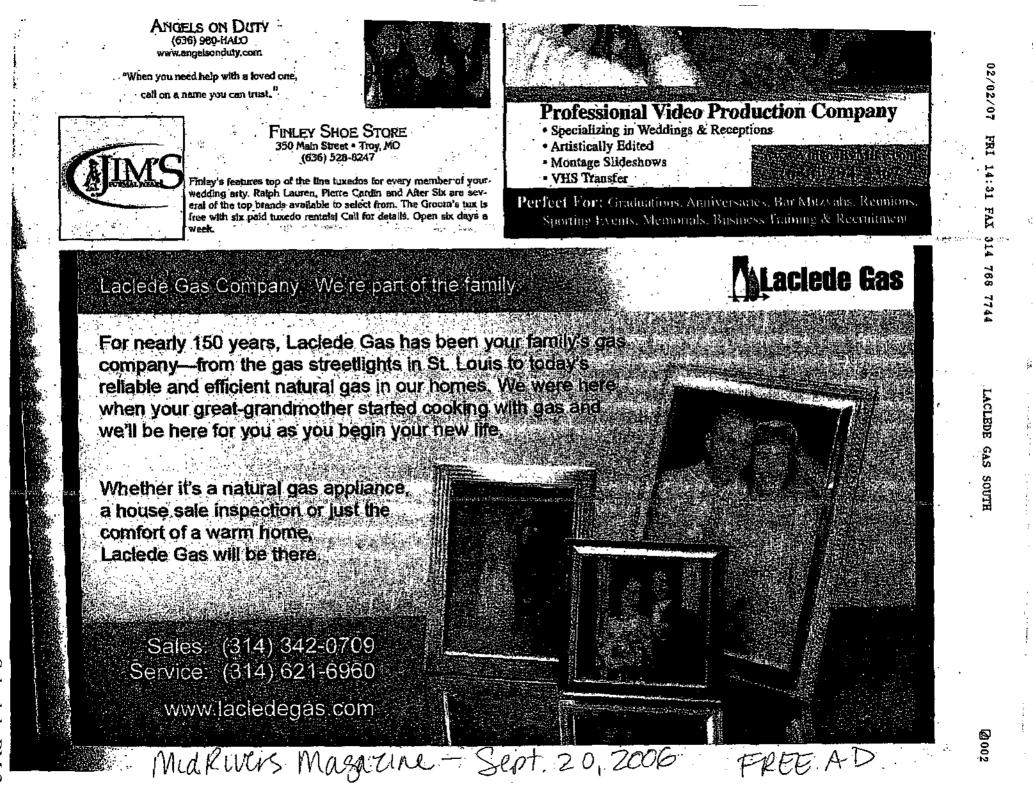
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4/24/2007

5/2/2007

Schedule PM 2-1

Laclede provided Staff with 7 pages of part of the family shot. 4 of those pages contained informational information on half of the full pages. Staff multiplied the 7 pages by 2 to make it 14 as Staff then allowed 4 out of the 14 advertisements to allow the generatal information ÷



etched in stone

YOUR GUESTS CAN NOW SIGN (OR FILM) MEMORIES TO LAST A LIFETIME

If you want your guest book to be simple, traditional and basic, you will likely go to your local stationery store and pick up one of those pretty lined books for your guests to sign. After your wedding day, you'il stow it away with your other wedding mementos. possibly never to be seen until your 50th anniversary party.

Your quest book doesn't have to collect dust ... or even be a book for that matter. Here are some suggestions on ways your guests can put a personal stamp on your day:

R Frame a favorite photo (possibly your

- engagement photo) of you and your new spouse with a large matte around it and have your guests sign the matter. After the wedding, frame it and hang it In your home.
- Instead of having a quest book attendant, have a camera attendant take Polaroid shots of guests as thay enter your reception site. They can then sign the bottoms of the photos and you can create a sorapbook with them after the honeymoon.
- # If you are using place cards, have your guests write notes or advice for a happy manlage on the back of them and then put them in a scrapbook.
- of Are you a sports fan? Have your guests sign jerseya, hookey sticks, basebalis or any other sports memorability to proudly display in your home. Forget signing altogether and use modern technology. Have a video station at your wadding, where guests can videotape a message to be kept on film forever.

Laclede Gas Company.

NLaciede Ga

Ne're part of the family.

For nearly 150 years, Laclede Gas has been your family signs company-from yesterday's gas streetlights to today's reliable and efficient natural gas in our homes. We were here when your great grandmother started cooking with gas and we'll be here for you as you begin your new life Whether it's a natural gas appliance; a house sale inspection is ar just the comfort of d warm home, Lociede Gas will be there

Sales: 314,342,0709 Service: 314.621.6960

www.laclededas.com



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Volume 3 Number 1 spring4 summer 2006

02/02/07 FRI 14:33 FAX 314 768 7744

LACLEDE GAS SOUTH

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Laclede Gas Company.



We're part of the family.

For nearly 150 years, Laclade Gas has been your family's gas compony-from the gas streetlights in St. Louis to roday's reliable and efficient natural gas in our homes. We were here when your great-grandmother started tooking with gas and we'll be here for you as you begin your new life

Whether it's a natural gas appliance, a house sole inspection or just the comfort of a warm home, Laclede Gas will be there.

Sales: 314.342.0709 Service: 314.621.6960 www.lacledegas.com

GAS APPLIANCE SERVICE WORK IS NOT SUBJECT TO PSC REGULATION.

Volume 2 Number 2

Fall + winter 2003

02/02/07 FRI 14:55 FAX 314 768 7744 02/02/2007 15:00 3147445047

ask the experi

LACLEDE GAS SOUTH

SUBURBAN JOURNALS

PAGE 03/03

Save Energy; Save Dollars; Winterize Your Home Now By Parnels Kramer Childress

Winter it just around the corner and that usually means cold weather and higher energy costs. Fight off "Old Man Winter" by making your home more energy efficient,

The higgest area for daily springs is with your home lisating restore. If your furnace is old, it might not be the mast energy efficient. Look for the EnergyGuide label when purchasing a furnace-raday's radels can be up to 96 percent efficient. Also, clean or change the filter in your furnace every month. If it's dirty, the unit has to work that much harder.

Annual inspections on your heating equipment are also a smatt way in make sure your furnace is openning the way it was meant m-call a licented locating and cooling contractor, or call the national gas expensive Laclede. To schedule a gas formace inspection, call us at (514) 621-6960.

Thermal windows are another way to save big on your . hearing hills. The cost upfrom is high, but the maney you'll sive in the long run makes it a smarr investment-most just when you're heating your home but when you're keeping ir coal ma.

If purchasing a new furnace or windows ju isn't in the budget, try these other quick fin to prepare your home for the winter season

- Turn your thermostar down when you're sleeping or leaving the ho purchase a programmable thermostat that does the temperature me for you -- pregram it to cool down when you're slopping of nor there want up stantly before you're due to wake up or arrive home.

Weatherize using heavy plastic and coulding around your window and roo Also, insulate your coullet covers with special foom available at hardware stor

 Insulate your dust work, pipes and water heaters with insulation "sleeves" or to heat the water in the tank, the more money you'll save,

· Participate in a budget billing program. These programs look at your annua and break the cost/down to 11 level payments. It is like a savings plan for you bill-you'll pay more in the summer when you're not heating your home so accrued for the winter when your bill is typically higher.

· Close vents to unused tooms and make sure your attic and walls are properly Some utility companyies offer programs that help consumers triance horizer and the purchase of high-efficiency furnaces. Laclede Gas does not sell furna insulation service work, but they will help you finance these items at low inter Call (514) 621-6960 and ask about the Residential Insulation Financing Progra EnergyWise Appliance Financing Program: For memonency-solving tips with out Mich site of www.lackelegak.com

Laclede Gas Company.

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part of the family.

50 years todede Gas has been your family's Ston yesterday's gas sheetlights to today's Sticionantal gas in the home. Year after de sependable clean birming natural gas of St. touis lomilies.

a house sale awarmer content of a wurm home,

es: 214 342.07 09 6000314(621.6960 en landelet et em

18 savvyfamily October 2006



Enjoy Grilling Year Round With a Natural Gas Grill

By Tammy Sansocie DeClue of Laclede Gas

ask the experi

Even though the days are shorter and the kids are back to school, the backyard barbecue doesn't have to end. With the convenience and case of a natural gas grill, you can have the flavor and fun of the "summertime barbecue" year round. Imagine the wonderful flavors of outdoor grilling-without the mess and inconvenience of charcoal or propane.

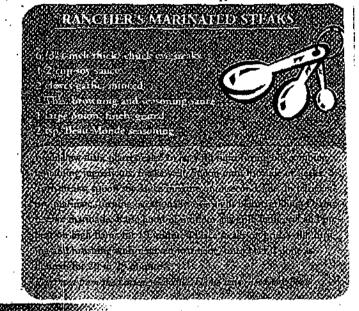
Grilling with natural gas is the choice for many Sr. Louis families-not only because it's convenient and less expensive to operate than a charcoal or propane grill-but also because natural gas is the "natural choice" for our environment. It's good to know that natural gas grills are virtually pollution free.

Laclede Gas Appliance Sales has a broad selection of high-quality grills, with many new features. In the past, most natural gas grills couldn't be moved and were installed on a post in the ground, or mounted on a deck. Today, natural gas grills are available on a portable cart with a hose that attaches to a "quick-disconnect"-an ontlet that allows you to plug in the grill without the use of tools. And, using multiple quick-disconnect outlets in the yard, patio or deck allow the grill to move to the place most convenient. The porcible natural gas grill can also be stored inside to protect it from the dements.

Some natural gas grills can also be converted into a smoker or overcnabling you to smoke your favorite means without having to purchase a separate smoker or bake those famous brownics without overhearing the kitchen. The natural gas grill is also great for the holiday season when space for ce ing a feast is cramped. Just grab a coar and head outside to that reliable, cle burning natural gas grill.

There are many wonderful recipes for the natural gas grill-listed her one of our favorites. If you would like to purchase Laclede's "Blue Fla Favorites" Cook Book, contact the Consumer Education Department (314) 768-7730 (all profits go to Dollar Help).

For more information about purchasing a natural gas grill, contact Applia. Sales at (314) 342-0709. or visit www.lacledcappllances.com.











18 savvyfamily September 2006

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Devices Virtually Eliminate the Need for Estimated Bills

By Pamela Kramer Childress

ask the experi

Most people don't ever look at the natural gas meter in or outside their home. Bin, for years, Laclode Gas has manually read meters to get accurate usage, information on how much natural gas a household consumer. Many households receive bills that are estimated --- based on usage from years past --especially when a meter is located inside the house and access is difficult.

Estimated readings don't make sense for anyone. Why should customers be paying for product that they might not be using? And it doesn't make good business sense for a company not to charge for product that is used. But, obtaining physical readings has always been a challenge - locked gates, unrestrained pers in the yard, or indoor meters, where appointments are required to gain access, impede the process of obtaining accurate readings.

Finally, rechnology has caught up with the system. Automated Meter. Reading (AMR) devices allow the customer's meter to be read at any time, remotely. So, whether your meter is outside next to Fido's doghouse, or hiding in the basement corner, you will be charged for the actual use of manural gas.

Eliminating estimated readings keeps you from being inconvenienced and ultimately allows you to better plan your budget.

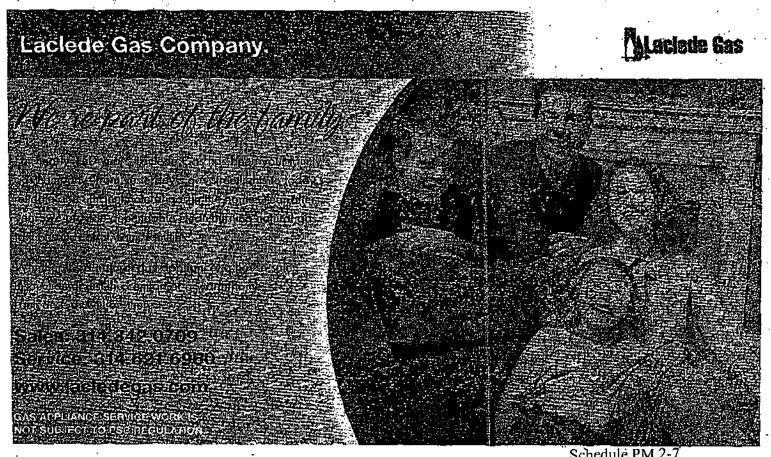
By early 2007, all 650,000 Laclede Gas and Missouri Natural customets will have AMR devices installed. Cellnet Technology, an independent contractor hilled by Laclede Gas, performs the installation that involves ampehing the device to the existing natural gas meter. The installation takes about 15 minutes. There is no installation charge and gas service is not interrupted.

AMR devices are installed on a rotating basis. Laclede will notify customers via mail 30-45 days before installation. Customers with outside meters do not need to be home for the installer, assuming access to the meter is possible. For customets with inside meters, the installer will leave a door hanger with a phone number if the customer is not home when the installation is anompted. In those instances, customers will need to call the phone number listed on the door hanger to schedule an appointment.

More than 66 million utility customers around the country use a system like AMR. It's a concept that has long been in the making at Laclede. And the company is proud to finally be able to bring the convenience of this technology. to our customeis.

Laclede appreciates our customers' parience with the installation process. And we look forward to the improved quality service the new AMR devices will provide our customers.

Inspections can be scheduled Monday through Friday as well as limited hours on evenings and Saturdays. Call Laclede Gas Consomer Service at (314) 621-6960 to schedule an inspection or visit unuulacledegas.com for more information.



FRI 14:42 FAX 314 768 7744 02/02/07

Gas Appliance Inspections Protect the New Homebuyer

By Pamela Kramer Childress

ask the expert

In today's competitive market, it's good to know somebody still looks out for the consumer. When buying a house, the gas appliance inspection is a consumer's best defense against unsafe equipment in the most imprisant purchase ever - the home.

The house sale inspection, as it's commonly known, ensures that the gas, appliances specified in the real estate contract pass safety code requirements in accordance with the National Fuel Gas Codes. These codes are continually reviewed and updated to remain current with new industry developments.

Because of the constant updates, it takes a highly qualified and experienced impartial party to decipher and implement the codes, A St. Louis landmark for nearly 150 years, the gas experts at Lacide Gas Company take pride in its highly united service technicians.

During a house sale inspection, Laclede inspects all natural gas appliances,

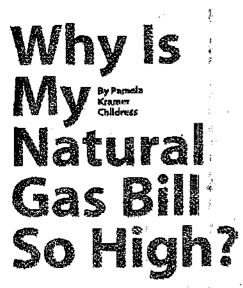
unless otherwise specified. Each appliance is inspected to ensure it compl with the manufacturer's intended use; is operating as it was originally des and is working in compliance with all the applicable codes.

Buying a house can be unnerving and although no one can predict the cycle of an appliance, the inspections are a good service and provide peace mind at a critical point in the purchasing process. House sale inspections typically one of the last steps before closing on a house, so timing is critic Laclede advises that to make a house sale inspection run smoothly, someo should be available, either during the inspection or via a telephone number for notification if an appliance fails. That individual can either ask the Lat technician to repair the appliance on the spot if time and materials permit can contact an outside contractor to repair it. The advantage of Ladiede m ing the repair is that the problem is resolved immediately, climinating pontial scheduling conflicts and saving the realtor and seller valuable time. All single-family house sale inspections cost \$100 for the initial inspect - if repairs are needed and authorized, additional time and material charge apply. Once repairs are made, a second inspection may or may not be required, depending on the mortgage lender. Follow-up inspections are also completed on a time and material basis. In all cases, the charges may be ad to the customer's gas account.

Inspections can be scheduled Manday shrough Friday as well as Emited hours evenings and Saturdays. Call Laclede Gas Customer Service at (314) 621-69 to schedule an inspection or visit unna lacledeges.com for more information.



02/02/07 FRI 14:41 FAX 314 768 7744 02/02/2007 15:00 3147445047



The wholesale cost of natural gas makes up the majority of a customer's Laclede Gas bill - typically 75 to 80 percent. When the company increases or decreases the Purchased Gas Adjustment (PGA) this refers to the market price. It's similar to gas stations passing on the commodity cost of gasoline to the consumer at the gas pump. However, when Laclede aeeds to adjust this market price, the Miscouri Public Service Commission must approve it. Although the market price isn't regulated, Laclede's caste is. LACLEDE GAS SOUTH SUBURBAN JOURNALS

Along with local taxes, the other components of a customer's bill - distribution and transmission -

comprise the remaining 20 to 25 percent. Transmission costs, regulated by the Federal Energy Regulatory Controlision, are the charges to move the gas by pipeline from the producets to Laclede. The distribution cost, regulated by this Missouri Public Service Commission, is Laclede's charge to bring gas from its facilities to the residence. This is also the portion of the bill where operating expenses fall, as well as any profits the company generates. The profit margin for Lachede, after expenses, is typically three percent of the bill.

HOW NATURAL GAS PRICES ARE SET As a commodity, natural gas is bought and sold the same way as oil, gold or even coffee. The wholesale cost of natural gas is determined by the marketplace – supply and demand influence its worth and price. This market price isn't regulated by any federal or state agency. However, the cost to move it through the pipeline and the cost ro distribute it to the end-user is.

WHY DEMAND IS HIGH

Natural gas is deilled from the ground by wells, much like oil, and transported via pipelines across the country. Natural gas is desirable because it can be used in its truest form - it doesn't need to be refined like oil, making it not only convenient, but efficient.

Natural gas is also highly efficient at its end-use - fueling appliances. A gas water heater reaches the desired temperature nearly rwice as fast as typical electric units. Natural gas is environmentally friendly - called the green energy because of its next-to-nothing emissions. And in today's volatile world market, natural gas is attractive because nearly all supplies come from the United States.

FACTORS THAT AFFECT PRICE

There are definite factors that affect supply and demand, and ultimately, the market price. A span of cold weather or brief severe weather increases demand in the winter months, when the use of natural gas is at its peak. Limited supplies, caused by weather (such as hurricane damage along the Gulf Coast) or high-usage, affect storage inventories. Problems within the infrastructure of other energy markets, such as a prolonged disruption in oil, also increase the demand for natural gas.

For none information on the natural gas industry, visit the American Gas Association Web site at ununuaga.org, or Laclede Gas Company at unutulaeledegat.com.



Laclede Gas Company.

se part of the family.

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March 2006 savvyfamily 19 Schedule PM 2-9

FAGE

Ising Energy Wisely Helps Minimize Ising Home Heating Bills By Particle Cost

zrving energy is a bot topic once the weather mider. This season's high marker price for al gas makes the case for conserving even compelling. While distribution companies aclede Gas are regulated by the Public Service mission, the wholesale price of natural gas is The local utility is at the mercy of the marker, this year, increased demand coupled with icane damage put stress on the supply. hese factors affect the wholesale price, h puts distribution companies in a pinch. he good news is that while most of the try is seeing increases in heating bills of reen 50 and 70 percent, Laclede's rates have increased by 38 percent. Laclede uses strateinancial instruments and other strategies like ng in the off-season and storing natural gas s underground facilities. In some states, gy shortgages require rolling outages, but ede has always had enough supply to keep omens warm for nearly 150 years. aclede works hard to try to hold costs down----

now it's the consumer's turn. Make your home more energy efficient and you will notice definite dollar savings on your monthly bill. The list below details some quick solutions.

- Turn your thermostat down when you're sleeping or leave the house. Or, purchase a programmable thermostar that does the remperature monitoring for you—program it to cool down when you're sleeping or not there and then warm up shortly before you're due to wake up or arrive home.
- Weatherize using heavy plastic and caulking around your window and door frames. Also, insulate your outlet covers with special foarn available at hardware stores. Anywhere air can escape in your home is a potential
- energy saving opportunity!
- Insulate your duct work, pipes and water heaters with insulation "sleeves" or "jackets". The less work your water heater has to do to heat the water in the tank, the more money you'll save. Turning the setting down a few notches on

water heaters also helps.

- Close vents to unused rooms and make sure your attic and walls are properly insulated. Some utility companies offer programs that help consumers finance home insulation and the purchase of high-efficiency furnances. Laclede Gas does not sell furnances or do insulation service work, but they will help you finance these items at low-interest rates. Call (314) 621-6960 and ask about the Residential Insulation Financing Program or the EnergyWise Appliance Financing Program.

For more information, visit unvia lacledegas.com and click on "Hot Tips for Cold Weather."

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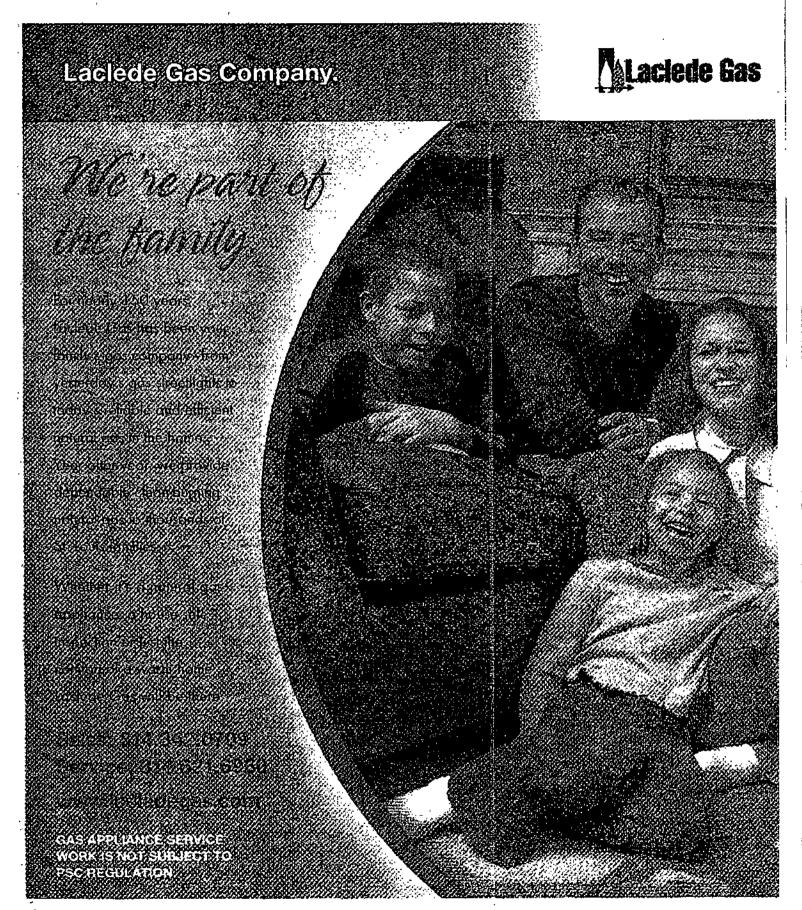
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The greatest chefs in the world all agree: When creating a culinary masterpiece for your guests or family, choose natural gas. It's the fuel of choice to lock in the full flavor of your favorite recipe. Whether you're cooking on the stove top or the grill in your back yard, nothing beats natural gas.

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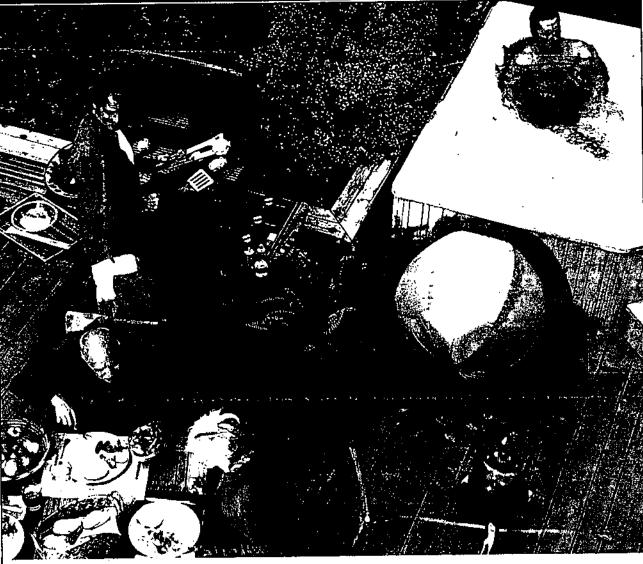
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At moments like this, when your family is warm and comfortable, you probably don't give a second thought to the natural gas used to heat your home. Isn't that the way it should be? Laclede Gas. One thing you can be sure of.

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At moments like this, you probably don't give a second thought to the natural gas that makes your family gatherings even more enjoyable. Isn't that the way it should be? Laclede Gas. One thing you can be sure of.

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the Natural Gas experts

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At moments like this...



At moments like this, you probably don't give a second thought to the natural gas used to prepare your family's meals. And isn't that the way it should be? Laclede Gas. One thing you can be sure of.

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