

**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            )     **File No. GO-2017-0201**  
Replacement Surcharge in its Missouri Gas Energy    )  
Service Territory    )

**MOTION OF MISSOURI GAS ENERGY,  
AN OPERATING UNIT OF LACLEDE GAS COMPANY, FOR AN ORDER  
DIRECTING THE OFFICE OF THE PUBLIC COUNSEL TO FILE ITS  
RECOMMENDATIONS REGARDING ISRS FILING WITHIN 60 DAYS**

COMES NOW Missouri Gas Energy (“MGE” or "Company"), an operating unit of Laclede Gas Company, and for its Motion for an Order Directing the Office of the Public Counsel (“OPC”) to File its Recommendations regarding ISRS Filing Within 60 Days states as follows:

1. On February 3, 2017, MGE filed its application in the above-captioned case to change its ISRS. As the Commission is aware from MGE’s last ISRS proceeding, Case No. GO-2016-0332, an issue arose regarding when OPC should be required to submit any recommendations it might have regarding an ISRS filing, with MGE taking the position that OPC should be required to submit its ISRS recommendations within the same 60 day period mandated for the Commission Staff under Section 393.1015.2(2) of the ISRS Statute. MGE submits that such an approach is warranted given: (a) the expedited nature of ISRS proceedings; (b) the fact that OPC is provided the same information at the same time as Staff, which is the party designated by statute to perform the ISRS audit; and (c) the due process rights of other parties to have an adequate opportunity to respond to OPC’s recommendations, and for the Commission to have an adequate opportunity to make a fully informed decision.

2. In addressing this issue during oral argument in Case No. GO-2016-0332, counsel for OPC suggested a procedural path for achieving such a result. As OPC stated:

In the future I suggest they make a request when they file their petitions asking the Commission to order OPC to raise issues within 60 days if that's what they expect. We would certainly follow that change in process if it were to be so. (Transcript page 18, Case No. GO-2016-0332).

3. Pursuant to OPC's suggestion, and the Commission's desire to have a formalized deadline for OPC's filing, MGE accordingly requests that the Commission order OPC to raise any issues it may have regarding this ISRS case by April 4, 2017, which is 60 days after today's filing. The Commission should also order Laclede to provide its updated information to OPC at the same time that such information is provided to Staff.

WHEREFORE, for the foregoing reasons, Missouri Gas Energy, an operating unit of Laclede Gas Company, respectfully moves the Commission to issue an order as requested herein, directing OPC to raise any issue it may have regarding the ISRS filing made in this case within 60 days of the date of such filing.

Respectfully submitted,

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ATTORNEYS FOR LACLEDE GAS AND MGE

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing Pleading was served on the Staff and the Office of the Public Counsel on this 3rd day of February, 2017 by hand-delivery, fax, electronic mail or United States mail, postage prepaid.

**/s/ Rick Zucker**