

April 8, 2013

VIA ELECTRONIC MAIL

Jeffrey Keevil, Esq.  
Robert Berlin, Esq.  
P.O. Box 360  
Jefferson City, MO 65102

Re: Case No. GR-2013-0171; Objection to Staff Data Requests (“DRs”) 200-204; 222

Dear Jeff and Bob:

Pursuant to 4 CSR 240-2.090(2), I am writing to object to DR Nos. 200-204 and 222. The reasons supporting this objection are provided below.

The DRs covered by this objection seek information that is not calculated to lead to the discovery of admissible evidence and/or that is unduly burdensome and oppressive. For example, DR 200 seeks information on Laclede’s underground storage facility (“UGS”). Notwithstanding the fact that underground storage has not been raised by Laclede as an issue in this case and cannot possibly have more than a negligible impact on the case, Laclede has already spent considerable time and resources producing a large quantity of information on this gas supply matter. And even though Laclede has operated this field for six decades, Staff now seeks through DR 200 “the exact location of all acreage” that is either leased or owned for UGS operations. For acreage leased, Staff seeks a copy of each lease, and for acreage owned, “for each purchase of land...identity the date when each tract of land was acquired...quantify the amount(s) paid for each tract of land...provide the journal entries used to record the purchase of the land...” Producing this ancient history, dating back to the 1950s, would require a substantial effort and cannot possibly be meaningful for a 2013 rate case. While Laclede will, notwithstanding its objection, evaluate the possibility of providing Staff with access to such information (assuming records that old can be effectively accessed), it would prefer to explore with Staff why it believes such information is necessary and relevant and what alternatives might meet Staff’s needs.

To that end, upon receiving this latest set of overly broad DRs, Laclede took to heart the advice of Judge Jones and took the proactive approach of promptly contacting Staff to discuss how Laclede might satisfy Staff’s reasonable information needs. As a result of this initial contact, Staff and Laclede have arranged a meeting to further discuss these DRs with a goal of bringing economy and efficiency to the DR process. Laclede looks forward to a productive discussion. However, given today’s objection deadline, Laclede is writing this letter to preserve its objections.

For the same reasons that Laclede is objecting to DR 200, Laclede also objects to DR 203, which seeks a host of detailed information by well on each well that recovers stored natural gas. The information sought by DR 203 on underground storage is replicated by DR 202 on oil wells and DR 204 on vent gas wells, and are objectionable for the same reasons. Likewise, DR 201 seeks the same information regarding propane that DR 200 seeks for natural gas, and is also

objectionable for the same reasons. Finally DR 221 seeks propane cavern reports back to 2002, which Laclede considers to be unduly burdensome as well as irrelevant, and DR 223 seeks dollar values for propane activity dating back to 2008, which Laclede considers to be unduly burdensome.

The gas-related DRs sent by Staff cover DR Nos. 200-208, 210-212, 219, 221-24, 241 and 244. For those gas-related DRs to which Laclede did not object, Laclede notifies Staff that it is unable to answer these DRs within the 20 day time limit, but believes it can provide responses by May 3, 2013.

As stated above, we look forward to speaking with you on Wednesday and reaching a mutually beneficial resolution to this matter.

Sincerely,

/s/Rick Zucker  
Rick Zucker  
Associate General Counsel

**Keevil, Jeff\***

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**From:** Zucker, Rick <RZucker@lacledegas.com>  
**Sent:** Friday, April 12, 2013 5:00 PM  
**To:** Keevil, Jeff\*  
**Cc:** Borgmeyer, John; Tompkins, Goldie\*; Berlin, Bob; Pendergast, Mike; Buck, Glenn; Cline, Michael; Sparacino, Gina  
**Subject:** Gas Supply related DRs 200-08, 210-12, 219, 221-24, 241, 244

Jeff:

Mike P. tells me you've been under the weather. I hope you're feeling better.

I am writing to follow up on our conference call on Wednesday regarding the above DRs. I thought the call was productive and helped us reach a more feasible way for Laclede to produce the information Staff seeks. I believe the statement that we agreed to provide by Tuesday will also streamline the process.

We are working on these DRs and have already begun to send responses ahead of the 20 day deadline. We will continue to send responses as they are completed. The volume of the DRs however prevents us from meeting the 20 day deadline. In lieu of the May 3 date we previously gave you for the DRs to which Laclede did not object, we believe that we can have responses as discussed at the meeting to all of the referenced DRs completed by April 30, which is a little less than two weeks after the deadline. Again, we do not intend to send the large majority of the information on the 30<sup>th</sup>; rather, we will send them when ready, and will produce the last of our responses by that date. Of course, if we can finish sooner than the 30<sup>th</sup>, we will do so.

Sincerely,

Rick Zucker  
Associate General Counsel  
Laclede Gas Company  
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St. Louis, MO 63101  
314-342-0533 Phone  
314-575-5557 Mobile

April 15, 2013

VIA ELECTRONIC MAIL

Jeffrey Keevil, Esq.  
Robert Berlin, Esq.  
P.O. Box 360  
Jefferson City, MO 65102

Re: Case No. GR-2013-0171; Extension of Time - Staff Data Requests ("DRs") 270-88; 290-93; 107.1; and 69.1

Dear Jeff and Bob:

Pursuant to 4 CSR 240-2.090(2), I am writing to notify Staff that Laclede is unable to answer the 25 gas supply-related DRs listed above within the 20 day time limit, but believes it can provide responses by May 7, 2013. Taken by themselves, these DRs, which were submitted between April 3 and April 5, might or might not require extra time. But when coupled with the 26 DRs served on March 27-28, they present a challenge. Laclede has committed to responding to the March 27-28 DRs by April 30. Laclede believes that it can complete its responses to the DRs listed above within one week afterward.

Consistent with the email I sent you on Friday, April 12, Laclede intends to send responses to the April 3-5 DRs when ready, and if we can produce the responses ahead of the May 7 deadline, we will do so.

Sincerely,

/s/Rick Zucker  
Rick Zucker  
Associate General Counsel