

**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) File No. GR-2017-0215

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

**RESPONSE OF THE OFFICE OF THE PUBLIC COUNSEL TO ORDER
DIRECTING FILING OF ADJUSTMENT INFORMATION REGARDING THE
TAX CUTS AND JOBS ACT AND REQUEST FOR
TECHNICAL CONFERENCE**

COMES NOW the Office of the Public Counsel and, in response to the Commission’s January 18, 2018 *Order Directing Filing of Adjustment Information Regarding the Tax Cuts and Jobs Act and Setting Procedural Dates*, and Spire’s response to that order, respectfully states:

1. On January 22, 2018, in response to the Commission’s *Order Directing Filing of Adjustment Information Regarding the Tax Cuts and Jobs Act and Setting Procedural Dates* Public Counsel states that the Commission should convene a Technical Conference as soon as possible.

2. In the absence of a procedural proposal from Spire, coupled with the uncertainly and lack of support for its “workpapers,” creates a lack of any framework for moving forward with a hearing.

3. On January 23, in response to the Commission’s Order noted above, Spire filed its signed affidavit. (Affidavit on tax reform with exh a.pdf.) (“Affidavit”)

4. In its January 23 signed affidavit Spire noted, “We will provide our confidential workpapers to Staff after we make today’s filing. (Affidavit para. 11.) The workpapers contained simplistic calculations with no discussion or explanation.

5. The Commission has ordered the parties, including Public Counsel, to file their requests for a hearing today.

6. In that regard, Public Counsel does request a hearing in this case, but OPC recommends the Commission Order a Technical Conference be convened as soon as possible.

7. At a minimum a Technical Conference could define the issues the Commission would need to address in its Orders in these rate cases. At best it might result in a joint recommendation to the Commission on how to address Spire’s tax reductions.

8. In its pleading, Spire raises the spectre of the March 8, 2018 operation of law date but does not offer any process for moving forward or when, how, or for how long it would address the tax reduction.

9. In its *Staff’s Reply Affidavit Regarding Tax Cuts and Jobs Act* (“TCJA”), Staff discusses the many questions involved with determining what effect the TCJA and suggests possible approaches to dealing with these questions, but no final solution.

10. To address the TCJA, Public Counsel suggests a Technical Conference is a necessary and reasonable way forward in these cases to discuss, narrow and perhaps reconcile the Staff’s quantifications and recommendations with the Companies’ numbers/

WHEREFORE Public Counsel recommends the Commission order a Technical Conference to be held as soon as possible but also reserve February 5 for hearing to address any issues left unresolved by the Technical Conference.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

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CERTIFICATE OF SERVICE

On this 25th day of January 2018, I hereby certify that a true and correct copy of the foregoing motion was submitted to all relevant parties by depositing this motion into the Commission's Electronic Filing Information System ("EFIS").

/s/ Lera L. Shemwell