

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

In The Matter of Laclede Gas)
Company’s PGA Filing)
 File No. GR-2014-0121
 Tariff No. JG-2014-0202

STAFF RECOMMENDATION TO APPROVE INTERIM RATES

COMES NOW the Staff (“Staff”) of the Missouri Public Service Commission (“Commission”), by and through counsel, and in response to the Commission’s November 1, 2013, *Order Directing Staff to File Recommendation*, hereby states:

1. On October 31,¹ Laclede Gas Company (“Laclede” or “Company”) filed a tariff sheet to reflect changes in Laclede’s Purchased Gas Adjustment (PGA) factors, as the result of estimated changes in the cost of natural gas for the upcoming winter season, and as the result of changes in Laclede’s Actual Cost Adjustment (ACA) factor. The tariff has a proposed effective date of November 16.

2. The Commission directed Staff to file a recommendation on Laclede’s tariff sheet no later than November 7.

3. As explained in Staff’s *Memorandum*, attached hereto as Appendix A and incorporated by reference, the proposed tariff sheet will reduce the PGA rate for Laclede’s customers during Laclede’s six-month winter season, from November through April. Staff reviewed Laclede’s tariff sheet and determined that it was calculated in conformance with Laclede’s PGA clause.

4. Staff will review the documentation Laclede provided in support of the ACA factor in this filing, and Staff will submit its results and recommendations regarding the ACA factor on or before December 19, 2014.

¹ All dates 2013 unless noted.

5. Case No. GR-2014-0121, under which these changes were filed, was established to track the Company's PGA factors to be reviewed in its 2012-2013 ACA filing. Case Nos. GR-2013-0253, GR-2012-0133, GR-2011-0055, GR-2010-0138, GR-2008-0387, GR-2008-0140, GR-2006-0288 and GR-2005-0203 were established to track the Company's PGA factors to be reviewed in its 2011-2012, 2010-2011, 2009-2010, 2008-2009, 2007-2008, 2006-2007, 2005-2006 and 2004-2005 ACA filings, respectively.

6. Staff found that the rate changes requested in this filing were calculated in conformance with Laclede's PGA clause, and therefore this rate change should be approved on an interim, subject to refund status pending final Commission decisions in ACA Case Nos. GR-2014-0121, GR-2013-0253, GR-2012-0133, GR-2011-0055, GR-2010-0138, GR-2008-0387, GR-2008-0140, GR-2006-0288 and GR-2005-0203. Other than these cases, Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

7. Staff is of the opinion that good cause for approval of this tariff sheet on less than thirty (30) days' notice is demonstrated by Laclede's Commission-approved PGA clause allowing for ten (10) business days' notice for PGA change filings.

WHEREFORE, Staff recommends that the following tariff sheet be approved on an interim basis, subject to refund:

P.S.C. MO. No.5 Consolidated

Two Hundred and Nineteenth Revised Sheet No. 29, Cancelling Two Hundred and Eighteenth Revised Sheet No. 29

Respectfully Submitted,

**STAFF OF THE MISSOURI
PUBLIC SERVICE COMMISSION**

/s/ John D. Borgmeyer

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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 7th day of November, 2013.

/s/ John D. Borgmeyer