

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

In the Matter of the Revised Tariff Sheets for     ) Case No. GT-2016-0026  
the Laclede Gas and Missouri Gas Energy         ) Tariff Tracking Nos. JG-2016-0018,  
Operating Units of Laclede Gas Company         ) JG-2016-0019 and JG-2016-0020

**REQUEST FOR ORDER DENYING STAFF’S MOTION TO REJECT AND  
APPROVING TARIFF SHEETS OR, IN THE ALTERNATIVE,  
REQUEST FOR ORAL ARGUMENT AND  
MOTION FOR EXPEDITED TREATMENT**

COMES NOW Laclede Gas Company (“Company” or “Laclede”) and requests that the Commission issue an order denying Staff’s Motion to Reject and approving Laclede’s July 21 Tariff filing for the reasons stated in the Company’s Response to Motion to Reject filed today in the referenced case. In the alternative, Laclede requests that the Commission schedule an oral argument on an expedited basis. In support of this request, Laclede states as follows:

1. On July 21, 2015, the Company submitted revised tariffs on behalf of its two operating units, Missouri Gas Energy (“MGE”) and Laclede Gas (“Laclede Gas”), with a proposed effective date of September 8, 2015 (the “Revised Tariffs”). One of the purposes of the Revised Tariffs was to achieve greater consistency in the tariffed processes and practices through which the Company’s two operating units provide service to their respective customers in a manner that enhances customer service and permits the Company to follow through on its integration goal of converting MGE from its old customer service system to the much newer Customer Care and Billing (“CCB”) system that was implemented for Laclede Gas in 2013.

2. The Commission Staff was aware of this conversion plan at the time it entered into the Stipulation and Agreement in the 2013 MGE acquisition proceeding, Case No. GM-2013-0254. Moreover, the terms of that Stipulation and Agreement left the Company free to pursue tariff changes that might be necessary to accommodate such a conversion. Nevertheless,

the Staff has now filed a Motion to Reject the Revised Tariffs based on a legal theory that is inconsistent with the statutes and case law governing the Commission's authority to approve tariff changes, as well as the Commission's long-standing practices in this area.<sup>1</sup>

3. Staff's unfounded Motion to Reject threatens to delay the conversion of these information systems, which is scheduled to occur over the labor day weekend in order to minimize customer inconvenience. It is not clear when the Company will have another opportunity to effectuate the conversion since the winter heating season, with all its demands, will be soon upon us. In the meantime, however, the Company will incur hundreds of thousands, if not millions, of dollars in additional expense in trying to run two duplicative customer service systems rather than one. In addition, the Company's efforts to move forward with important modeling and planning functions for enhancing the reliable and efficient operation of MGE's gas supply feeder, main and distribution system will also be delayed since these activities are also dependent on the conversion to CC&B. There is absolutely no rationale or justification for such counterproductive, wasteful and unnecessarily costly results.

4. Accordingly, Laclede requests that the Commission deny Staff's motion to reject tariffs, and approve the Revised Tariffs effective as of the requested effective date of September 8, 2015. If the Commission is not inclined to deny Staff's Motion to Reject and approve the Revised Tariffs based on the pleadings that have been submitted, the Company would respectfully request that the Commission schedule an oral argument on this matter so that the issues raised by Staff can be promptly addressed and resolved and the Company can hopefully go about the task of improving service for its customers.

5. Pursuant to its Motion for Expedited Treatment, Laclede requests that the Commission schedule an oral argument on or before August 21, 2015, and approve the Revised

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<sup>1</sup> See Company's Response in Opposition to Staff's Motion to Reject the Revised Tariffs.

Tariffs effective September 8. As discussed herein, and in the Company's Response in Opposition to Staff's Motion to reject, benefits will accrue to MGE customers if the Company can implement its system conversion on the planned date of September 8, and harm will be avoided to the Company and its customers by avoiding the cost of continuing to run two parallel systems. This pleading was filed as soon as it could have following the Staff's Motion to Reject and in advance of the date set by the Commission.

Respectfully Submitted,

**LACLEDE GAS COMPANY**

**/s/ Rick Zucker**

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing pleading has been duly served upon Counsel for the Staff of the Public Service Commission and the Office of the Public Counsel by hand delivery, email, fax, or United States mail, postage prepaid, on this 12th day of August, 2015.

**/s/ Marcia Spangler**

Marcia Spangler