BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Missouri Gas Energy,)	
an Operating Unit of Laclede Gas Company,)	File No. GR-2015-0025
for Approval to Establish an Infrastructure System)	
Replacement Surcharge)	

RESPONSE TO STAFF'S AMENDED RECOMMENDATION AND MOTION FOR EXPEDITED TREATMENT

COMES NOW Missouri Gas Energy ("MGE" or "Company"), an operating unit of Laclede Gas Company, and files its response to the Amended Staff Recommendation filed on September 30, 2014, and also files its Motion for Expedited Treatment. In support thereof, MGE states as follows:

1. MGE agrees to and accepts the Staff's September 30 Amended Recommendation in this case, and asks the Commission to issue its Order: (a) rejecting the tariff filed by MGE on July 25, 2014; (b) directing the Company to file a revised tariff sheet in the form contained in the attached specimen tariff sheet that complies with the rates and revenues set forth on Appendix B to the Amended Staff Recommendation; and (c) pursuant to Commission Rule 4 CSR 3.265(9), approving the notices and bill format as referenced in paragraph 17 of MGE's July 25 Application and set forth in Appendices E and F to the Application.

Motion for Expedited Treatment

2. MGE requests that the tariff sheet establishing a new ISRS for MGE be approved for service rendered on and after October 18, 2014. First, such expedited treatment would permit the ISRS tariff to become effective on the same date requested by

Laclede Gas for its ISRS filing, thereby maintaining continuity in the processing of the two operating units' ISRS filings. Second, such an effective date provides the Commission with one week to consider and dispose of the case with time left over for a 10 day effective date. Third, there is no dispute regarding the amounts to be recovered through this ISRS filing. Fourth, all included items are currently in service and being used to render utility service and any delay beyond the requested effective date would simply unnecessarily prolong the date when such costs can begin to be recovered.

- 3. For all of these reasons harm will be avoided, and there will be no negative effect on Laclede's customers or the general public if the Commission issues such an order.
- 4. This pleading was filed as soon as it could have been following receipt and evaluation of the Amended Staff Recommendation.
- 5. Laclede has contacted Staff and Public Counsel and is authorized to represent that neither opposes this request for expedited treatment.

WHEREFORE, for the foregoing reasons, MGE respectfully requests that the Commission accept this response and, consistent with Staff's Amended Recommendation, issue its Order: (a) rejecting the tariff filed on July 25, 2014; (b) directing the Company to file a revised tariff sheet effective October 18, 2014 with the same rates contained in the attached specimen tariff; and (c) approving the notices and bill format as referenced in paragraph 17 of the Application and set forth in Appendices E and F to the Application.

Respectfully submitted,

/s/ Rick E. Zucker

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ATTORNEYS FOR LACLEDE GAS COMPANY

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing pleading was served on all of the parties to this on this 2nd day of October, 2014 by hand-delivery, fax, electronic mail or by placing a copy of such Application, postage prepaid, in the United States mail.

/s/ Marcia Spangler
Marcia Spangler

P.S.C. MO. No. <u>6</u> Canceling P.S.C. MO. No. 6 Second Revised First Revised SHEET No. <u>10</u> SHEET No. 10

Laclede Gas Company

For: All Missouri Gas Energy Service Areas

INFRASTRUCTURE REPLACEMENT SURCHARGE (ISRS)

<u>Description</u>: Rate ISRS is designed to recover the costs associated with the Company's eligible infrastructure replacements in accordance with the provisions of sections 393.1009, 393.1012 and 393.1015, RSMo.

<u>Applicability</u>: Rate ISRS is applicable to each customer billing for service during the effectiveness of the ISRS rate element.

ISRS Rate Element: In addition to the other charges provided for in the Company's tariff, a monthly ISRS Rate Element shall be added to each bill for service on and after the effective date of the ISRS rate. The amount of the ISRS Rate Element, by customer class, is as follows:

Residential	\$0.29 per month	*
Small General Service	\$0.44 per month	*
Large General Service	\$1.48 per month	*
Large Volume Service	\$11.58 per month	*
Whiteman Air Force Base	\$11.58 per month	*
Intrastate Transportation Service	\$11.58 per month	*

* - indicates new rate

DATE OF ISSUE <u>October 2 2014</u> DATE EFFECTIVE <u>November 2, 2014</u> month day year

ISSUED BY: L. Craig Dowdy, Sr. VP, Ext. Affairs, Corp. Communications & Marketing
Laclede Gas Company, St. Louis, MO. 63101