# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Verified Application and	)	
Petition of Missouri Gas Energy, an Operating	)	
Unit of Laclede Gas Company, to Change its	)	Case No. GO-2015-0270
Infrastructure System Replacement Surcharge in	)	
its Missouri Gas Energy Service Territory	)	

## RESPONSE TO STAFF RECOMMENDATION AND AMENDED MOTION FOR EXPEDITED TREATMENT

COMES NOW Missouri Gas Energy ("MGE") an operating unit of Laclede Gas Company ("Laclede Gas"), and responds to Staff's Recommendation and renews and amends its Motion for Expedited Treatment (this "Motion") for approval by the Commission, stating as follows:

- 1. On May 1, 2015, the Staff of the Missouri Public Service Commission filed its recommendation in this case in which it recommended that the ISRS Application filed by MGE on April 17, 2015 be approved with certain adjustments that MGE has now incorporated in the Tariff Filing attached hereto and filed contemporaneously herewith. MGE concurs in the Staff's Recommendation, and requests that the Commission place this matter on its May 13 agenda for approval of the revised tariff, effective as of the tariff's effective date of May 22, 2015.
- 2. As explained in the April 17 Application, the ISRS eligible projects included therein cover the same projects that were addressed by a January 30, 2015 ISRS filing in Case No. GO-2015-0179. The January 30 filing was dismissed as part of an understanding with Staff and OPC to refile the ISRS application with actual plant costs substituted for amounts that were previously budgeted. Such modifications were without

prejudice to any parties' right to take whatever position they believe is appropriate in subsequent ISRS proceedings.

- 3. On behalf of the Parties, MGE represented in its Joint Notice of Dismissal of Case No. GO-2015-0179 that the Parties would work to review this filing expeditiously. Accordingly, MGE included a Motion for Expedited Treatment with its April 17 Application. Staff fulfilled its commitment to expedite this case by filing its recommendation within 2 weeks of the refiling.
- 4. In this Motion, MGE requests that the Commission act to approve the Agreement and ISRS Tariff Sheet No. 10, which was filed today, at its agenda meeting on Wednesday, May 13, 2015 with an effective date of May 22, 2015, which is the effective date listed on the tariff. There is good cause for such expedited treatment pursuant to the understanding reflected in the Joint Notice of Dismissal that the parties would work to implement the Company's ISRS filings as soon as reasonably possible.
- 5. Since this request is based upon the Joint Notice of Dismissal, which was endorsed by all of the Parties to this case and approved by the Commission, harm will be avoided, and the intent of the Parties and the Commission will be served, by a Commission order approving MGE's revised ISRS tariff sheet and directing that it become effective May 22, 2015. MGE states that there will be no negative effect on MGE's customers or the general public if the Commission issues such an order.
- 6. This pleading was filed as soon as it could have been following receipt and evaluation of the Staff Recommendation, and discussions with Staff and OPC.
- 7. MGE has discussed this Motion with counsel for the Staff and OPC and Staff has indicated that it has no objection to the relief requested herein.

**WHEREFORE**, for the foregoing reasons, Missouri Gas Energy respectfully requests that the Commission issue its Order approving the revised ISRS Tariff Sheet No. 10 filed today, effective as of May 22, 2015.

Respectfully submitted,

MISSOURI GAS ENERGY, An operating unit of Laclede Gas Company

#### /s/ Rick Zucker

Rick Zucker #49210 Associate General Counsel 720 Olive Street St. Louis, Missouri 63101 (314) 342-0533 (Phone) (314) 421-1979 (FAX) rick.zucker@thelacledegroup.com

## **Certificate of Service**

I hereby certify that copies of the above and foregoing document were sent by electronic mail on this 11th day of May, 2015 to counsel of record.

/s/ Marcia Spangler

P.S.C. MO. No. <u>6</u> Canceling P.S.C. MO. No. 6 Fourth Revised
Third Revised

SHEET No. 10 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	\$0.71 per month	*
Small General Service	\$1.05 per month	*
Large General Service	\$3.57 per month	*
Large Volume Service	\$27.96 per month	*
Whiteman Air Force Base	\$27.96 per month	*
Intrastate Transportation Service	\$27.96 per month	*

### \* - indicates new rate

DATE OF ISSUE April 17, 2015 DATE EFFECTIVE May 22, 2015 month day year month day year

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