

MEMORANDUM

To: Missouri Public Service Commission Official Case File  
Case No. GR-94-220, Laclede Gas Company

From: David Birenbaum, Manager - Depreciation Department *David Birenbaum*

Subject: Staff's Recommendation Regarding Laclede's Application for Variance  
from 4 CSR 240-40.040(6)(B)2 in Case No. GR-94-220

Date: January 26, 1994

Reviewed by: *Sam Alkhamra 1/27/94*  
Utility Operations Division/Date

*Robert J. Hark 1/27/94*  
General Counsel's Office/Date

On January 14, 1994 Laclede Gas Company (LGC) filed for a general increase in rates. Along with its rate increase request, LGC filed an Application for Variance from 4 CSR 240-40.040(6)(B)2. This rule states that each gas corporation subject to the Commission's jurisdiction shall submit a depreciation study, data base, and property unit catalog when the utility files its tariff(s) proposing a general rate increase.

LGC states that personnel are currently working on the depreciation study but will not have the effort completed until March 11, 1994. LGC intends to submit the study and data on or before March 11, 1994.

LGC argues that since the study and data will be submitted less than sixty days after the initiation of this general rate proceeding, approval of the requested extension will not deprive Staff or other parties time to fully evaluate such information and prepare testimony in accordance with the expected procedural schedule in the rate case.

Staff has no objection to allowing LGC to file its depreciation study on or before March 11, 1994, in as much as LGC has requested only a two month extension to file and this date will fall approximately within the time allowed per the expected procedural schedule.

However, Staff does not agree with and disputes LGC's assertion that approval of the requested extension to file its study data will not deprive Staff of necessary time to evaluate fully such information to comply with the expected procedural schedule. Indeed, if LGC is permitted two additional months in which to file its study data, Staff has lost two months in which to begin its independent investigation into just and proper depreciation rates for LGC.

**FILED**

JAN 27 1994

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Staff has been in contact, through its General Counsel, with LGC. So long as LGC provides acceptable data to Staff as soon as possible, and no later than February 15, as discussed, Staff will not take issue with this item.

Staff does not object to allowing LGC to file its depreciation study on or before March 11, 1994.

cc: Director - Policy  
Director - Services  
Manager - Accounting  
Manager - Energy  
Manager - Financial Analysis  
OPC  
Mike Pendergast  
Bob Carroll