

MEMORANDUM

TO: Missouri Public Service Commission Official Case File,
Case No. GR-2011-0055, File No. JG-2011-0224
Laclede Gas Company

FROM: Tom Solt, Energy Department – Tariffs/Rate Design

/s/ Thomas M. Imhoff /s/ Lera Shemwell
Utility Operations Division/Date Staff Counsel's Office/Date

SUBJECT: Staff Recommendation on Laclede Gas Company's Scheduled Winter Season PGA Filing Effective November 16, 2010

DATE: November 5, 2010

On October 29, 2010, Laclede Gas Company (Laclede or Company) of St. Louis, Missouri, filed a tariff sheet proposed to become effective November 16, 2010. The tariff sheet was filed to reflect scheduled changes in Laclede's Purchased Gas Adjustment (PGA) factors as the result of an estimated change in the cost of natural gas for the upcoming winter season and changes in the Actual Cost Adjustment (ACA) factor. Laclede defines its Winter Season as November through April. All other gas companies have a five month winter season, November through March. The PGA impact on a customer's bill is during Laclede's six month winter season.

The effect of these changes from this filing will reduce the PGA rate filed by Laclede on November 16, 2010, from \$0.65238 per therm to \$0.64093 per therm. This represents a decrease of \$0.01145 per therm.

Case No. GR-2011-0055, under which these changes were filed, was established to track the Company's PGA factors to be reviewed in its 2009-2010 ACA filing. Case Nos. 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 2008-2009, 2007-2008, 2006-2007, 2005-2006, and 2004-2005 ACA filings, respectively. This rate change should be on an interim, subject to refund status pending final Commission decisions in ACA Case Nos. GR-2011-0055, GR-2010-0138, GR-2008-0387, GR-2008-0140, GR-2006-0288, and GR-2005-0203.

Due to the limited time available to review the documentation supporting the ACA factor represented in this filing, the Procurement Analysis Department (PAD) has requested permission to submit its results and recommendations regarding the information included in this ACA filing to the Commission on or before December 31, 2011.

Staff has verified that the Company has filed its annual report and is not delinquent on any of its assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

The Staff has reviewed this PGA filing and has determined that it was calculated in conformance with Laclede's PGA Clause. Staff is of the opinion that good cause for approval of this tariff sheet on less than thirty days notice is demonstrated by Laclede's Commission approved PGA clause allowing for ten (10) business days notice for PGA change filings.

Therefore, Staff recommends that the following tariff sheet, filed on October 29, 2010 be approved, interim, subject to refund:

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

Two Hundred and Sixteenth Revised Sheet No. 29, Cancelling Two Hundred and Fifteenth Revised Sheet No. 29

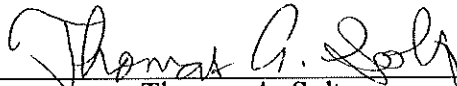
**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Laclede Gas Company's)
Annual November PGA/ACA Filing) Case No. GR-2011-0055

AFFIDAVIT OF THOMAS A. SOLT

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Thomas A. Solt, of lawful age, on oath states: that he participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was provided to him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief.



Thomas A. Solt

Subscribed and sworn to before me this 5th day of November, 2010.



Notary Public

NIKKI SENN Notary Public - Notary Seal State of Missouri Commissioned for Osage County My Commission Expires: October 01, 2011 Commission Number: 07287016
