BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Laclede Gas Company's)File No. GR-2014-0231PGA Filing)Tariff No. YG-2014-0324

STAFF RECOMMENDATION TO APPROVE INCREASE TO PGA RATE

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its recommendation in this matter hereby states:

1. On February 14, 2014, Laclede Gas Company ("Laclede" or "Company") filed a revised tariff sheet to increase its Purchased Gas Adjustment (PGA) rate.¹ Laclede's filing states that the increase in the PGA rate reflects increases in the Company's gas supply costs caused by rising natural gas prices.

2. The tariff (YG-2014-0324) bears a proposed effective date of March 4, 2014.

3. Also on February 14, the Commission ordered Staff to file its recommendation regarding the proposed tariff sheet no later than February 21, 2014.

4. As explained in Staff's *Memorandum*, attached hereto as Appendix A and incorporated by reference, the tariff sheet implements changes as the result of an estimated increase in the cost of natural gas for the remaining winter season, as well as changes in the L. P. Gas PGA (LPPGA) and in the Capacity Reservation (CR) factor.

5. The effects of these changes from this filing will increase the PGA rate from \$0.50265 per therm to \$0.54973 per therm. This represents an increase of \$0.04708 per therm. The LPPGA will increase from \$1.56097 per gallon to \$2.43226

¹ On February 14, this tariff and the *Commission's Order Directing Staff to File a Recommendation* was inadvertently included in the docket for Laclede's October PGA filing (GR-2014-0121). On February 19, 2014, Laclede re-filed the tariff in this docket.

per gallon. This is an increase of \$0.871285 per gallon. The Capacity Reserve (CR) will increase \$.08356 per therm to \$.08418 per therm. This represents an increase of \$0.00062 per therm. According to Laclede's filing, the bill for a typical residential customer will increase by \$5.60, or 5.3 percent compared to existing rates, during March.

6. 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 these tariff sheets 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.

7. As explained in Staff's *Memorandum*, this rate change should be on an interim, subject-to-refund status pending final Commission decisions in ACA Case Nos. GR-2014-0231, GR-2014-0121, GR-2013-0253, GR-2012-0133, GR-2011-0055, GR-2010-0138, GR-2008-0387, GR-2008-0140, GR-2006-0288 and GR-2005-0203.

8. Staff verified that Laclede has filed its annual report and is not delinquent on any of its assessment. Other than the ACA cases mentioned above, Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

WHEREFORE, Staff respectfully recommends that the following tariff sheet, filed on February 14, 2014, be approved, interim, subject to refund:

<u>P.S.C. MO. No.5 Consolidated</u> <u>Two Hundred and Twenty-First Revised Sheet No. 29, Cancelling Two Hundred and</u> <u>Twentieth Revised Sheet No. 29</u>

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Respectfully Submitted,

STAFF OF THE MISSOURI PUBLIC SERVICE COMMISSION

/s/ John D. Borgmeyer

John D. Borgmeyer Deputy Legal Counsel Missouri Bar No. 61992 Attorney for the Staff of the Missouri Public Service Commission P.O. Box 360 Jefferson City, Missouri 65102 Telephone: (573) 751-5472 Fax: (573) 751-9285 Email: john.borgmeyer@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 21st day of February, 2014.

/s/ John D. Borgmeyer

MEMORANDUM

TO: Missouri Public Service Commission Official Case File, Case No. GR-2014-0231, File No. YG-2014-0324 Laclede Gas Company

FROM: Thomas M. Imhoff, Energy Unit – Tariffs/Rate Design

/s/ Thomas M. Imhoff	02/21/2014	/s/ John Borgmeyer	02/21/14
Utility Operations Division/Date		Staff Counsel's Office/Date	

- SUBJECT: Staff Recommendation to Approve Laclede Gas Company's Optional Winter Season PGA Filing Effective March 4, 2014
- DATE: February 21, 2014

On February 14, 2014, Laclede Gas Company (Laclede or Company) of St. Louis, Missouri filed a tariff sheet proposed to become effective March 4, 2014. 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 remaining winter season and changes in the L. P. Gas PGA (LPPGA) and in the Capacity Reservation (CR) 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 the remainder of Laclede's six-month winter season.

The effects of these changes from this filing will increase the PGA rate from \$0.50265 per therm to \$0.54973 per therm. This represents an increase of \$0.04708 per therm. The LPPGA will increase from \$1.56097 per gallon to \$2.43226 per gallon. This is an increase of \$0.871285 per gallon. The CR will increase \$.08356 per therm to \$.08418 per therm. This represents an increase of \$0.00062 per therm.

Case No. GR-2014-0231, under which these changes were filed, was established to track the Company's PGA factors to be reviewed in its 2013-2014 ACA filing. Case Nos. GR-2014-0121, GR-2013-0253, GR-2012-0133, GR-2011-0055, 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 2012-2013, 2011-2012, 2010-2011, 2009-2010, 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-2014-0231, GR-2014-0121, GR-2013-0253, GR-2012-0133, GR-2011-0055, GR-2010-0138, GR-2008-0387, GR-2008-0140, GR-2006-0288 and GR-2005-0203.

The Energy Unit – Tariffs/Rate Design Staff (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.

Appendix A

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 these tariff sheets 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 February 14, 2014 be approved, interim, subject to refund:

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

Two Hundred and Twenty-First Revised Sheet No. 29, Cancelling Two Hundred and Twentieth Revised Sheet No. 29

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

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In the Matter of Laclede Gas Company's Purchased Gas Adjustment (PGA) Tariff Filing

Case No. GR-2014-0231

AFFIDAVIT OF THOMAS M. IMHOFF

STATE OF MISSOURI)) ss COUNTY OF COLE)

Thomas M. Imhoff, 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.

Thom M. Awf Thomas M. Imho

Subscribed and sworn to before me this 21^{SL} day of February, 2014.

LAURA BLOCH Notary Public - Notary Seal State of Missouri **Commissioned for Cole County** My Commission Expires: June 21, 2015 Commission Number: 11203914