

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

In the Matter of the filing of Laclede Gas)	
Company's PGA factors to be reviewed in)	Case No. GR-2013-0253
its 2011-2012 ACA filing.)	Tracking No. JG-2013-0213

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") in the above-captioned matter and, in response to the tariff filed by Laclede Gas Company ("Laclede" or "Company") on October 31, 2012 to implement a reduction in its PGA rate, Staff recommends approval of the tariff sheet filed on October 31, 2012 on an interim, subject to refund basis, and further states:

1. On October 31, 2012, Laclede Gas Company ("Laclede" or "Company") of St. Louis, Missouri, filed a tariff sheet proposed to become effective November 16, 2012.
2. 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.
3. Laclede's tariffs define its Winter Season as November through April. All other gas companies have a five month winter season, November through March.
4. The effect of the changes from this filing will reduce the PGA rate from \$0.59440 per therm to \$0.53589 per therm. This represents a decrease of \$0.05851 per therm.

5. This rate change should be approved only on an interim, subject to refund status pending final Commission decisions in ACA Case Nos. 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.

6. Due to the limited time available to review the documentation supporting the ACA factor represented in this filing, the Staff's Procurement Analysis Unit (PAU) has requested permission to submit its results and recommendations regarding the information included in this ACA filing to the Commission on or before December 23, 2013.

7. 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.

8. 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 the 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.

WHEREFORE, Staff recommends the proposed tariff sheet be approved on an expedited basis, interim, subject to refund.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 8th day of November 2012.

/s/ Jeffrey A. Keevil