

*Exhibit No.:*  
*Issue:* *Bad Debt in PGA, CAM*  
*Witness:* *David M. Sommerer*  
*Sponsoring Party:* *MoPSC Staff*  
*Type of Exhibit:* *Surrebuttal Testimony*  
*Case No.:* *GR-2010-0171*  
*Date Testimony Prepared:* *July 20, 2010*

**MISSOURI PUBLIC SERVICE COMMISSION**

**UTILITY SERVICES DIVISION**

**SURREBUTTAL TESTIMONY**

**OF**

**DAVID M. SOMMERER**

**LACLEDE GAS COMPANY**

**CASE NO. GR-2010-0171**

*Jefferson City, Missouri*  
*July, 2010*

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1 addressed Laclede's proposal to allow recovery of bad debt expense in the PGA in my  
2 rebuttal testimony and still believe that the Company's proposal is inappropriate for the  
3 reasons discussed in my direct and rebuttal testimonies.

4 **PGA ELEMENTS OF LACLEDE'S COST ALLOCATION MANUAL**

5 Q. Mr. Cline states that the Staff has proposed to defer any consideration of those  
6 provisions of the CAM that relate to gas supply and capacity transactions to the Company's  
7 ACA proceedings. What is your understanding of the status of this issue?

8 A. For the purposes of this rate case, no resolution has been reached regarding the  
9 CAM provisions related to PGA/ACA transactions that Mr. Cline discusses in his Rebuttal  
10 testimony at pages 26 through 32. While this matter is not being further litigated in this case,  
11 the Staff wanted to go on record that it does not agree with most of the assertions made by  
12 Mr. Cline in his rebuttal testimony regarding these matters.

13 Q. Does this conclude your surrebuttal testimony?

14 A. Yes, it does.

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

In the Matter of Laclede Gas Company's Tariff     )  
to Increase Its Annual Revenues for Natural     )     Case No. GR-2010-0171  
Gas Service     )

AFFIDAVIT OF DAVID M. SOMMERER

STATE OF MISSOURI     )  
                                      )     ss.  
COUNTY OF COLE     )

David M. Sommerer, of lawful age, on his oath states: that he has participated in the preparation of the foregoing Surrebuttal Testimony in question and answer form, consisting of 2 pages to be presented in the above case; that the answers in the foregoing Surrebuttal Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true and correct to the best of his knowledge and belief.

  
David M. Sommerer

Subscribed and sworn to before me this 14<sup>th</sup> day of July, 2010.



  
Notary Public