

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

In the Matter of the Verified Application and)
Petition of Laclede Gas Company to Change its) Case No. GO-2015-0269
Infrastructure System Replacement Surcharge in)
its Laclede Service Territory)

**RESPONSE TO STAFF RECOMMENDATION AND
AMENDED MOTION FOR EXPEDITED TREATMENT**

COMES NOW Laclede Gas Company (“Laclede Gas”), and files this Response to Staff’s Recommendation, and renews and amends its Motion for Expedited Treatment (the “Motion”) for approval by the Commission, stating as follows:

1. On May 1, 2015, the Staff of the Missouri Public Service Commission filed its recommendation in this case in which it recommended that the ISRS Application filed by Laclede Gas on April 17, 2015 be approved as filed. Laclede concurs in Staff’s Recommendation and requests that the Commission place this case on its May 13 Agenda for approval of the ISRS tariff, effective as of the tariff’s effective date of May 18.

2. As explained in the April 17 Application, the ISRS eligible projects included therein cover the same projects that were addressed by a January 30, 2015 ISRS filing in Case No. GO-2015-0178. The January 30 filing was dismissed as part of an understanding with Staff and OPC to refile the ISRS application with: (a) telemetric costs excluded pending the issuance of a Supreme Court opinion that may bear on the propriety of including such costs; and (b) with actual plant costs substituted for amounts that were previously budgeted. Such modifications were without prejudice to any parties’ right to take whatever position they believe is appropriate in subsequent ISRS proceedings.

3. On behalf of the Parties, Laclede Gas represented in its Joint Notice of Dismissal of Case No. GO-2015-0178 that the Parties would work to review this filing

expeditiously. Accordingly, Laclede included a Motion for Expedited Treatment with its April 17 Application. Staff fulfilled its commitment to expedite this case by filing its recommendation within 2 weeks of the refiling.

4. In this Motion, Laclede Gas requests that the Commission act to approve the Agreement and ISRS Tariff Sheet No. 12, which was filed on April 17, at its agenda meeting on Wednesday, May 13, 2015 with an effective date of May 18, 2015. There is good cause for such expedited treatment pursuant to the understanding reflected in the Joint Notice of Dismissal, and in paragraph 15 of the Partial Stipulation and Agreement approved by the Commission in Case No. GR-2013-0171 (the “Rate Case Stipulation”), wherein the parties have agreed to work to implement the Company’s ISRS filings as soon as reasonably possible.

5. Since this request is based upon the Joint Notice of Dismissal and the Rate Case Stipulation, which was signed by all of the Parties to this case and approved by the Commission, harm will be avoided, and the intent of the Parties and the Commission will be served, by a Commission order approving the Agreement and directing the Company’s ISRS tariff sheet to become effective on the effective date stated on the tariff, May 18, 2015. Laclede Gas states that there will be no negative effect on Laclede’s customers or the general public if the Commission issues such an order.

6. This pleading was filed as soon as it could have been following receipt and evaluation of the Staff Recommendation, and discussions with Staff and OPC.

7. Laclede Gas has discussed this Motion with counsel for the Staff and OPC and Staff has indicated that it has no objection to the relief requested herein.

WHEREFORE, for the foregoing reasons, Laclede Gas Company respectfully requests that the Commission issue its Order approving the Agreement and ISRS Tariff Sheet No. 12 filed on April 17, 2015, effective as of the tariff's effective date of May 18, 2015.

Respectfully Submitted,

LACLEDE GAS COMPANY

/s/ Rick Zucker

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Certificate of Service

I hereby certify that copies of the above and foregoing document were sent by electronic mail on this 11th day of May, 2015 to counsel of record.

/s/ Marcia Spangler