

Exhibit No.:
Issue: Propriety of Including Telemetric
Equipment and Regulator Stations
as ISRS-Eligible Costs
Witness: Patrick A. Seamands, Ph.D
Type of Exhibit: Rebuttal Testimony
Sponsoring Party: Laclede Gas Company
Case No.: GO-2015-0341
Date Prepared: October 9, 2015

LACLEDE GAS COMPANY
GO-2015-0341
REBUTTAL TESTIMONY
OF
PATRICK A. SEAMANDS, Ph.D
OCTOBER 2015

SURREBUTTAL TESTIMONY OF PATRICK A. SEAMANDS

1 Q. **PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

A. My name is Patrick A. Seamands, and my business address is 700 Market St., St. Louis, Missouri, 63101.

2 Q. **ARE YOU THE SAME PATRICK A. SEAMANDS WHO PREVIOUSLY FILED**
3 **DIRECT TESTIMONY ON BEHALF OF LACLEDE GAS COMPANY**
4 **(“LACLEDE” OR “COMPANY”) IN THIS PROCEEDING?**

5 A. Yes, I am.

6 Q. **WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

7 A. The purpose of my rebuttal testimony is to briefly respond to the direct testimony filed by
8 Jacqueline Moore on behalf of the Office of the Public Counsel (“OPC”).

9 Q. **PLEASE PROCEED.**

10 A. I think it's important to note at the outset that the very brief direct testimony filed by OPC
11 in this case does not contain any policy or factual analysis relating to the contested issues
12 in this case. Instead, it consists almost entirely of a few references to portions of some
13 DR responses or testimony that has previously been filed and a summary of budgets and
14 actual amounts; all without any explanation of why the materials being cited are relevant
15 to the issues in this case. At the same time, OPC has chosen not to file any rebuttal
16 testimony at all in response to the direct testimony that I submitted on these issues.

17 Q. **WHAT DO YOU CONCLUDE FROM THIS?**

18 A. I can only conclude that OPC is not challenging either the accuracy or validity of the
19 facts and policy considerations that I have given in my testimony as to why the telemetry
20 and regulator stations at issue in this case are fully eligible for inclusion in the Company's
21 ISRS under the applicable ISRS statute and regulations. Since OPC has offered nothing

1 in its testimony to dispute these key facts and policy considerations – or my explanation
2 of why they demonstrate the ISRS eligibility of these facilities – I believe there is simply
3 no basis in the record that would support a different conclusion. Accordingly, I again
4 urge the Commission to find that the telemetry and regulator stations at issue in this case
5 are eligible for inclusion in the Company’s ISRS as established by the undisputed
6 evidence on the record.

7 **Q. DO YOU HAVE ANY OTHER COMMENTS REGARDING THE DIRECT**
8 **TESTIMONY FILED BY OPC?**

9 **A.** My only other comments relate to the two regulator station work orders replicated by Ms.
10 Moore on page 8 of her direct testimony in which she states that the word “Strategic” was
11 contained in the “Reason Code” for the work order. Again, like the rest of her testimony,
12 Mr. Moore provides no explanation for why she is citing these documents or what
13 possible significance they have to the issues in this case. I can only assume then that Ms.
14 Moore may be referencing the term “Strategic” to imply that the regulator stations at
15 issue were replaced for some reason other than safety. For the reasons discussed in my
16 direct testimony, however, any implication of this kind would be completely inaccurate.
17 These regulator stations were installed both as an integral part of the Company’s cast iron
18 replacement program and as a means of replacing other regulator stations that were in
19 worn-out and deteriorated condition. In any event, as used by the Company in these
20 work orders, “strategic” simply means that such replacements were being done in a
21 coordinated manner to ensure that the replacements were performed in as efficient a
22 manner as possible.

23 **DOES THIS COMPLETE YOUR REBUTTAL TESTIMONY?**

1 A. Yes.