

**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-2011-0361
Infrastructure System Replacement Surcharge)	Tariff File No. YG-2011-0556

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

COMES NOW Laclede Gas Company ("Laclede" or "Company") and files this Response to Staff Recommendation and Motion for Expedited Treatment, and in support thereof, states as follows:

1. On May 2, 2011, Laclede filed a proposed tariff sheet entitled Seventeenth Revised Sheet No. 12 (the "Tariff Sheet"), in connection with its application to establish an ISRS in this case. The Tariff Sheet has been docketed as YG-2011-0556. The Tariff Sheet was intended to recover incremental annual pre-tax revenues of \$2,339,633, based upon ISRS eligible replacements from December 1, 2010 through March 31, 2011 plus pro forma ISRS costs through May 31, 2011.

2. On June 27, 2011, Staff timely filed its Recommendation ("Staff Recommendation"), in which it recommended that the Commission reject the Company's tariff filing, and instead approve the Staff's determination of such revenues, based upon actual ISRS eligible costs incurred from December 1, 2010 through May 31, 2011 in the amount of \$2,319,935. The Staff recommended that Laclede be authorized to file ISRS rates as reflected in Attachment B to the Staff Recommendation.

Response to Staff Recommendation

3. Laclede responds to the Staff Recommendation by stating that it accepts the Staff's figure for annual pre-tax revenues as stated in paragraph 2 above, and accepts the ISRS rates reflected in Attachment B of the Staff Memorandum.

4. Contemporaneously herewith, Laclede is filing a tariff (the "Compliance Tariff"), with rates that comply with Attachment B to the Staff Recommendation.

Motion for Expedited Treatment

5. Pursuant to paragraph 16 of the Partial Stipulation and Agreement approved by the Commission in Case No. GR-2010-0171 (the "Stipulation"), the parties have agreed to work to implement the Company's ISRS filings as soon as reasonably possible. Accordingly, in its May 2 Application, Laclede requested that the Commission approve Laclede's application effective July 8, 2011. Laclede herein renews its request, and respectfully asks that the Commission shorten the time for response to the Staff's Recommendation and, if there is no opposition to the Staff Recommendation, approve the Compliance Tariff effective as soon as reasonably practicable, but not later than July 8, 2011.

6. Since this request is based upon the 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 Commission approval of the Compliance Tariff effective by July 8, 2011. Laclede states that there will be no negative effect on Laclede's customers or the general public if the Commission acts to permit the Compliance Tariff to be effective on or before the date requested.

7. This pleading was filed as soon as it could have been following receipt and evaluation of the Staff Recommendation.

WHEREFORE, for the foregoing reasons, Laclede Gas Company respectfully requests that the Commission shorten the time to respond to the Staff Recommendation and, if there is no opposition to the Staff Recommendation, the Commission approve the annual pre-tax ISRS revenues and rates in accordance with the Staff Recommendation and the Compliance Tariff, all effective as soon as reasonably possible, but no later than July 8, 2011.

Respectfully submitted,

/s/ Michael C. Pendergast

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ATTORNEYS FOR
LACLEDE GAS COMPANY

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing pleading was served on all parties of record this 27th day of June, 2011 by hand-delivery, fax, electronic mail or by placing a copy of such pleading, postage prepaid, in the United States mail.

/s/ Gerry Lynch

Gerry Lynch