

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Office of the Public Counsel,)
)
Complainant,)
)
v.)
)
Laclede Gas Company, and)
Missouri Gas Energy,)
)
Respondents.)

Case No. GC-2016-0297

SUPPLEMENT TO ANSWER TO COMPLAINT

COME NOW Respondents Laclede Gas Company (“Laclede” or “Company”), including its Laclede Gas (herein so called) operating unit, and Missouri Gas Energy (“MGE”), and supplements their Answer filed on May 31 in this case, stating as follows:

1. On May 31, 2016, Respondents filed an Answer to the Complaint in this case, along with a response to Complainant’s motion for expedited treatment.¹ In paragraphs 18-23 of the Answer, Respondents stated, among other things, (i) that Complainant filed the complaint without referring to two monthly financial reports Respondent delivers to Staff and OPC: one that arises out of the MGE Acquisition case, and the other a longstanding surveillance report; and (ii) that a gain from the sale of property was not removed from Respondents’ income as a non-recurring item.

2. Respondents hereby supplement paragraphs 18-23 of the Answer by stating that they have provided Staff and Complainant with their surveillance reports for the 12 months ended April 30 and May 31, 2016. Both reports are attached hereto as Schedule 1.

¹ Respondents also filed a Motion to Dismiss the Complaint. The Answer was filed in the alternative, in the event the Motion to Dismiss is not granted. Neither the Answer nor this supplement should be interpreted as waiving Respondents’ requests for relief in the Motion to Dismiss.

3. The April surveillance report is the first of these 12-month reports that does not include the substantial gain on the sale of the Forest Park property. The ROE on this report for the 12 months ended April 30, 2016 was ** _____ **. This was derived in the same manner used by Complainant, that is, Net Income divided by Common Stock Equity. As can be seen on the report, dividing Net Income of ** _____ ** (line 223) by Common Stock Equity of ** _____ ** (line 112) results in the ** _____ ** ROE.

4. The May surveillance report, which has just become available, reflects an ROE for the 12 months ended May 31, 2016 of ** _____ **. This was also derived in the same manner used by Complainant, that is, Net Income divided by Common Stock Equity. As in the April report, dividing Net Income of ** _____ ** (line 223) by Common Stock Equity of ** _____ ** (line 112) results in the ** _____ ** ROE.

5. ** _____

_____**

Accordingly, Laclede hereby supplements its Answer in this case and renews its request that the Complaint be dismissed.

Respectfully Submitted,

/s/ Rick Zucker

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing pleading was served on the parties of record in this case on this 24th day of June, 2016 by United States mail, hand-delivery, email, or facsimile.

/s/ Marcia Spangler _____

Schedule 1
Is Highly Confidential
In Its Entirety