

MEMORANDUM

TO: Missouri Public Service Commission Official Case File,
Case No. GR-2013-0253, File No. JG-2013-0213
Laclede Gas Company

FROM: Kim Cox, Energy Unit – Tariffs/Rate Design

/s/ Thomas M. Imhoff 11/08/12 /s/ Jeffrey A. Keevil 11/08/12
Utility Operations Division/Date General Counsel's Office/Date

SUBJECT: Staff Recommendation on Laclede Gas Company's Scheduled Winter Season
PGA Filing Effective November 16, 2012

DATE: November 08, 2012

On October 31, 2012, Laclede Gas Company (Laclede or Company) of St. Louis, Missouri filed a tariff sheet proposed to become effective November 16, 2012. The tariff sheet was filed to reflect scheduled changes in Laclede's Purchased Gas Adjustment (PGA) factors as the result of an estimated change in the cost of natural gas for the upcoming winter season and changes in the Actual Cost Adjustment (ACA) factor. Laclede defines its Winter Season as November through April. All other gas companies have a five month winter season, November through March. The PGA impact on a customer's bill is during Laclede's six month winter season.

The effects of these changes from this filing will reduce the PGA rate from \$0.59440 per therm to \$0.53589 per therm. This represents a decrease of \$0.05851 per therm.

Case No. GR-2013-0253, under which these changes were filed, was established to track the Company's PGA factors to be reviewed in its 2011-2012 ACA filing. Case Nos. GR-2012-0133, GR-2011-0055, GR-2010-0138, GR-2008-0387, GR-2008-0140, GR-2006-0288 and GR-2005-0203 were established to track the Company's PGA factors to be reviewed in its 2010-2011, 2009-2010, 2008-2009, 2007-2008, 2006-2007, 2005-2006 and 2004-2005 ACA filings, respectively. This rate change should be on an interim, subject to refund status pending final Commission decisions in ACA Case Nos. GR-2013-0253, GR-2012-0133, GR-2011-0055, GR-2010-0138, GR-2008-0387, GR-2008-0140, GR-2006-0288 and GR-2005-0203.

Due to the limited time available to review the documentation supporting the ACA factor represented in this filing, the Procurement Analysis Unit (PAU) has requested permission to submit its results and recommendations regarding the information included in this ACA filing to the Commission on or before December 23, 2013.

The Energy Unit – Tariffs/Rate Design Staff (Staff) has verified that the Company has filed its annual report and is not delinquent on any of its assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

The Staff has reviewed this PGA filing and has determined that it was calculated in conformance with Laclede's PGA Clause. Staff is of the opinion that good cause for approval of these tariff sheets on less than thirty days notice is demonstrated by Laclede's Commission approved PGA clause allowing for ten (10) business days notice for PGA change filings.

Therefore, Staff recommends that the following tariff sheet, filed on October 31, 2012 be approved, interim, subject to refund:

P.S.C. MO. No.5 Consolidated

Two Hundred and Eighteenth Revised Sheet No. 29, Cancelling Two Hundred and Seventeenth Revised Sheet No. 29

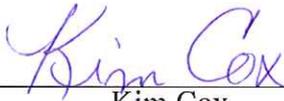
**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Laclede Gas Company's) File No. GR-2013-0253
Scheduled November PGA Filing) JG-2013-0213

AFFIDAVIT OF KIM COX

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

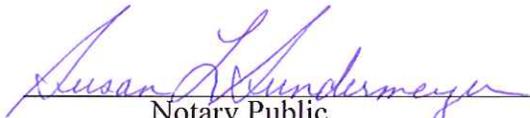
Kim Cox, of lawful age, on oath states: that she has participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was given by her; that she has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of her knowledge and belief.



Kim Cox

Subscribed and sworn to before me this 8th day of November, 2012.

SUSAN L. SUNDERMEYER Notary Public - Notary Seal State of Missouri Commissioned for Callaway County My Commission Expires: October 03, 2014 Commission Number: 10942086
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Notary Public