

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**

**PROPOSED PROCEDURAL SCHEDULE  
OF LACLEDE GAS COMPANY**

COMES NOW Laclede Gas Company (“Laclede” or “Company”) on behalf of itself and its operating units, Missouri Gas Energy (“MGE”) and Laclede Gas (herein so called), and submits the following Proposed Procedural Schedule, stating as follows:

1. By Order dated August 3, 2016, the Commission directed the parties to jointly or separately submit a proposed procedural schedule for this case. Laclede has consulted with OPC, but has not been able to reach agreement on a proposed procedural schedule. Accordingly, Laclede recommends that the Commission adopt the following schedule:

Oct. 12, 2016 (Wed)	Direct
Jan 17, 2017 (Tue)	Rebuttal
Feb 17, 2017 (Fri)	Surrebuttal/Cross-Surrebuttal
Feb 27, 2017 (Mon)	List of Issues, Order of Witnesses and Cross
March 6, 2017 (Mon)	Statements of Position
March 20-24, 2017 (Tue-Fri)	Hearing
April 24, 2017 (Mon)	Initial brief
May 8, 2017 (Mon)	Reply Brief

2. Laclede shared this final schedule with the parties this morning. Counsel for the Missouri Department of Energy (DE) has indicated that DE agrees with this schedule.

3. Laclede would note that in establishing this procedural schedule, it used as a template the expedited procedural schedule established by the Commission in the recent earnings complaint proceeding involving Ameren Missouri, Case No. EC-2014-0223. In that case, the Commission provided Ameren 90 days between the time the Complainant filed direct testimony and the time that Ameren was required to file rebuttal testimony.<sup>1</sup> In an effort to match the abbreviated schedule in the Ameren case, Laclede is proposing an interval of 97 days between OPC's direct filing and the rebuttal filings of Laclede Gas and MGE. The difference of 7 days is due to the large number of holidays between October and January, as compared to Ameren's period of February to May. In fact, Laclede notes that the number of business days allowed in this procedural schedule match the number of business days Ameren was allowed in preparing its rebuttal testimony. Laclede maintains that matching the Ameren schedule is more than fair for a number of reasons.

4. First, in contrast to the Ameren Missouri proceeding, this Complaint involves cost of service issues for two operating units, each with different rates, charges, cost structures, revenues, expenses, capital programs and regulatory assets/liabilities. Because there are two operating units, this proceeding will also involve a variety of cost allocation issues that would normally not be present in a rate review proceeding involving a single entity. Given the additional resources and time required by Laclede to prepare rebuttal testimony and supporting schedules for the revenue requirement, rate design and other issues associated with two separate costs of service, there is certainly no basis for providing Laclede and MGE less time than

---

<sup>1</sup> Ameren ultimately received 120 days to file rebuttal after the schedule was revised to accommodate a change in the hearing dates.

Ameren was allowed. This is especially true given the fact that Laclede will be dealing with many of these issues for the first time, since it did not own MGE until 2013 and therefore does not have a history of prior work to rely on when determining how to address them.

5. Second, not only does the rebuttal interval match the amount of time ordered by the Commission in the Ameren case, it is only 5 business days longer than the amount of time proposed by parties in that case.

6. Finally, Laclede would note that its ability to prepare a rebuttal case depends almost exclusively on what OPC chooses to address in its direct case. Unlike the Complainant in the Ameren Missouri complaint case, OPC chose not to include any testimony, accounting schedules or other financial information at the time it filed its Complaint. As a result, Laclede has received no information to date that would provide even a rudimentary insight into what the scope or nature of OPC's direct case will be, what issues OPC will or will not raise, or what arguments it will put forward in support of its position on those issues. Given the fact that this is the approach OPC, and OPC alone, chose to follow, there is even less justification for cutting short the time Laclede Gas and MGE have to prepare their rebuttal cases when compared to the time the Commission found to be appropriate in the Ameren Missouri case.

WHEREFORE, for the foregoing reasons, Laclede Gas and MGE respectfully request that the Commission adopt the procedural schedule proposed herein.

Respectfully Submitted,

**/s/ Rick Zucker**

Rick Zucker, Mo. Bar #49211  
Associate General Counsel - Regulatory  
Missouri Gas Energy  
700 Market Street, 6<sup>th</sup> Floor  
St. Louis, MO 63101  
Telephone: (314) 342-0532  
Fax: (314) 421-1979

Email: rick.zucker@spireenergy.com

**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 25st day of August, 2016 by United States mail, hand-delivery, email, or facsimile.

**/s/ Marcia Spangler**\_\_\_\_\_