Exhibit No.:	
Issue:	ISRS Updates
Witness:	Glenn W. Buck
Type of Exhibit:	Direct Testimony
Sponsoring Party:	Laclede Gas Company
Case No.:	GO-2015-0341; GO-2015-0343
Date Prepared:	August 28, 2015

LACLEDE GAS COMPANY

GO-2015-0341 GO-2015-0343

DIRECT TESTIMONY

OF

GLENN W. BUCK

August 2015

DIRECT TESTIMONY OF GLENN W. BUCK

2	Q.	PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.
	A.	My name is Glenn W. Buck, and my business address is 700 Market St., St. Louis,
		Missouri, 63101.
3	Q.	WHAT IS YOUR PRESENT POSITION?
4	A.	I am presently employed as Director, Regulatory and Finance, for Laclede Gas Company
5		("Laclede" or "Company").
6	Q.	PLEASE STATE HOW LONG YOU HAVE HELD YOUR POSITION AND
7		BRIEFLY DESCRIBE YOUR RESPONSIBILITIES.
8	A.	I was appointed to my present position in April 2013. In this position, I am responsible
9		for the financial aspects of rate matters generally, including financial analysis and
10		planning. I am also responsible for monitoring regulatory trends and developments in
11		Missouri and various other jurisdictions.
12	Q.	WHAT WAS YOUR EXPERIENCE WITH THE COMPANY PRIOR TO
13		BECOMING DIRECTOR, REGULATORY AND FINANCE?
14	A.	I joined Laclede in August 1986, as a Budget Analyst in the Budget Department. I was
15		promoted to Senior Budget Analyst in June 1988, and transferred to the Financial
16		Planning Department in December 1988 as an Analyst. I was promoted to Senior
17		Analyst in February 1990, Assistant Manager in February 1994, and Manager in January
18		1996. In March of 1999 I was promoted to Manager, Financial Services. I have been
19		working on regulatory issues since 1988 and have worked on rate cases since preparing
20		the accounting schedules in GR-90-120. Further, I was responsible for the preparation of
21		every one of the Laclede Gas operational unit's ISRS filings since the mechanism was
22		established in August of 2003.

1 Q. WHAT IS YOUR EDUCATIONAL BACKGROUND? 2 A. I graduated from the University of Missouri - Columbia, in 1984, with a Bachelor of Science degree in Business Administration. 3 4 Q. HAVE YOU PREVIOUSLY FILED **TESTIMONY** BEFORE THIS 5 **COMMISSION?** Yes, I have, in Case Nos. GR-94-220, GR-96-193, GR-99-315, GT-2001-329, GR-2001-6 A. 629, GR-2002-356, GO-2004-0443, GR-2005-0284, GR-2007-0208, GT-2009-0026, ER-7 2010-0036, GR-2010-0171, GC-2011-0006, GC-2011-0098, GO-2012-0363, GR-2013-8 0171, GR-2014-0007, GO-2015-0178, and GO-2015-0179. Further, I provided oral 9 testimony before the Commission regarding the Infrastructure System Replacement 10 Surcharge ("ISRS") rulemaking in Case No. AX-2004-0090. 11 **PURPOSE OF TESTIMONY** 12 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY? 13 The purpose of my testimony is to provide support for the Company's inclusion of 14 A. budgeted ("proforma") estimates, as updated by actual expenditures, in the current ISRS 15 filings of both Laclede Gas and Missouri Gas Energy. In the Laclede Gas ISRS case, 16 Company witness Patrick Seamands will be addressing the ISRS eligibility of the 17 Company's investment in new telemetric equipment to replace old, worn out models and 18 its investment in regulator stations to replace multiple deteriorated stations as part of the 19 20 cast iron replacement program. PLEASE DESCRIBE THE ISSUE RAISED BY THE OFFICE OF PUBLIC 21 Q. COUNSEL ("OPC") IN ITS REQUEST FOR A HEARING. 22

1 A. In a pleading filed in Laclede's last ISRS proceeding, Case No. GO-2015-0178, OPC took issue with the Company's inclusion of budgeted ISRS amounts in its ISRS filing. 2 According to OPC: "Allowing the ISRS to include costs incurred after the application is 3 unlawful under the ISRS statutes, which require schedules and supporting documentation 4 to be filed with the application. To allow a gas utility to insert additional costs into its 5 ISRS request months after its initial filing denies Public Counsel from the full 120 days 6 to contest the request." Based on its Motion to Reject in this ISRS case, it appears that 7 OPC is raising the same issue in this proceeding. 8

WILL THE INFORMATION SUPPLIED BY THE COMPANY TO UPDATE THE 9 Q. PROFORMA FIGURES IN ITS APPLICATION IN THE PROCEEDING BE 10 SUBMITTED "MONTHS" AFTER THE COMPANY FILED ITS APPLICATION 11 AS PUBLIC COUNSEL ASSERTED IN LACLEDE'S LAST ISRS 12 **PROCEEDING?** 13

The Company is updating estimated ISRS expenditures for the months of July and 14 A. No. August 2015 in a reasonable period of time – weeks, not months. The updated actual 15 figures for July have already been provided to both Staff and OPC on August 14, 2015, 16 17 just two weeks after Laclede filed its ISRS on July 31, 2015. The Company anticipates that the updated actual figures for August will be provided to Staff and OPC no later than 18 September 14, 2015, which is just six weeks after the current ISRS was filed, and 18 days 19 20 before the 60-day recommendation is due. Laclede has committed to such timely updates in its future ISRS filings as well. 21

Q. IS IT UNUSUAL TO INCLUDE PRO-FORMA INFORMATION IN A CASE AND THEN UPDATE IT WITH ACTUAL DETAILS WHEN THEY BECOME AVAILABLE?

A. Absolutely not. Parties have applied this same practice in rate cases for many years. The 4 estimates of capital expenditures to be "closed" to plant in service in the months of July 5 and August 2015 were provided as estimates in this ISRS case in much the same way 6 estimates are routinely included in the initial filing in rate cases and subsequently updated 7 and even "trued-up" with actuals during the pendency of those proceedings. 8 9 Additionally, rate cases involve a far greater amount of information exchanged while the amount of time to review such updates is not significantly different than that being 10 provided for updated ISRS filings. 11

Q. IS THE PERIOD OF TIME AVAILABLE TO REVIEW THE UPDATED ISRS INFORMATION SUBSTANTIALLY DIFFERENT THAN THE PERIOD OF TIME AFFORDED TO REVIEW UPDATED OR TRUED-UP INFORMATION IN A RATE PROCEEDING?

A. No, they are comparable. As previously noted, the complete updated information related 16 to the ISRS-eligible property for July was provided to Staff and OPC on August 14, 17 2015, which is approximately 7 weeks before the October 2, 2015 due date for Staff's 18 Recommendations. The actual figures for August should be provided to Staff and OPC 19 by September 14, 2015 which is 18 days prior to the due date for Staff's 20 Recommendation. In my experience, this interval of time between providing updated 21 information and the reviewing party filing its recommendation is consistent with the time 22 23 intervals for providing and reviewing updated information in rate cases where Staff or

OPC had filing deadlines. For example, in Laclede's 2007 general rate case proceeding, 1 the Staff filed its revenue requirement testimony and accounting schedules on May 4, 2 2007 based on updated information that was provided on April 20, 2007 (for the period 3 ending March 31, 2007). This two week period for auditing updated information in the 4 2007 rate case was actually shorter than the 18 day audit period provided for in this case. 5 Similarly, in the Company 2010 general rate case proceeding, the Staff filed its revenue 6 requirement testimony and accounting schedules on May 10, 2010 based, in part, on 7 updated information that had been supplied by the Company as late as April 28, 2010. 8 Again, this was a significantly shorter audit interval than the one afforded in this case, 9 and, as discussed later in this testimony, ISRS filings require a less burdensome audit 10 11 process.

12 Q. IS INCLUSION OF PRO-FORMA INFORMATION IN THE ISRS 13 APPLICATION CONSISTENT WITH PAST PRACTICE IN LACLEDE GAS 14 ISRS CASES APPROVED BY THE COMMISSION?

Yes. There have been pro-forma estimates followed by reconciliations in Laclede Gas 15 A. ISRS cases going back to at least 2009. In fact, the update of ISRS plant to reflect two 16 17 months of additional ISRS investments is part and parcel of a corresponding practice of also updating ISRS plant to reflect an additional three to four months of accumulated 18 depreciation expense and deferred tax liability, which results in reductions in ISRS 19 20 revenues. The inclusion of estimates, updated by actual expenditures, was first approved in a Laclede ISRS proceeding in early 2009 in Case No. GO-2009-0221. Such practice 21 has been approved by the Commission in every Laclede Report and Order issued since 22 23 that time including: Case Nos: GO-2009-0389, GO-2010-0212, GO-2011-0058, GO-

2 2011-0361, GO-2012-0145, GO-2012-0356, GO-2013-0352, GO-2014-0212, and GR-2 2015-0026. The Office of Public Counsel has had an opportunity to participate in each of 3 these cases, and has in fact participated in them. Further, both the Commission Staff, in 4 its Recommendations, and the Company (in its application and supporting schedules) 5 have clearly identified in formal submissions the use of this practice in these prior ISRS 6 filings. At no time over this 6 year time frame and multiple series of ISRS filings had 7 OPC ever suggested that there was anything unlawful or improper about this practice.

8 Q. SHOULD THERE BE ANY HEIGHTENED CONCERN REGARDING THE

9 AMOUNT OF TIME PROVIDED TO AUDIT ISRS ADDITIONS VERSUS THE

10 AUDIT TIME IN OTHER PROCEEDINGS?

21

- 11 A. No. In fact, just the opposite is true. That's because the ISRS statute provides for a
- 12 simplified audit process, as ISRS costs can be audited again for prudence in a subsequent
- 13 rate case. The ISRS legislation (393.1015(2)(2)) provides that,

"The staff of the commission may examine information of the gas corporation to confirm that the underlying costs are in accordance with the provisions of sections 393.1009 to 393.1015, and to confirm proper calculation of the proposed charge, and may submit a report regarding its examination to the commission not later than sixty days after the petition is filed. No other revenue requirement or ratemaking issues may be examined in consideration of the petition or associated proposed rate schedules filed pursuant to the provisions of sections 393.1009 to 393.1015."

- 22 The scope of the audit is meant to determine if the included projects are ISRS-eligible
- and if the calculations were done correctly. Section 393.1015(8) provides that,
- 24 "Commission approval of a petition, and any associated rate schedules, to establish or 25 change an ISRS pursuant to the provisions of sections 393.1009 to 393.1015 shall in no 26 way be binding upon the commission in determining the ratemaking treatment to be 27 applied to eligible infrastructure system replacements during a subsequent general rate 28 proceeding when the commission may undertake to review the prudence of such costs. In 29 the event the commission disallows, during a subsequent general rate proceeding, 30 recovery of costs associated with eligible infrastructure system replacements previously

included in an ISRS, the gas corporation shall offset its ISRS in the future as necessary to recognize and account for any such overcollections."

In other words, even though the costs of an ISRS project may be in ISRS rates, those 4 costs are subject to a prudence review in a subsequent rate case and, if the costs are found 5 to be imprudent, ISRS amounts collected on the project will be refunded to customers in 6 future ISRS proceedings. In contrast, an audit in a rate case proceeding must determine 7 both the propriety and prudence of a particular expenditure without any subsequent 8 opportunity to revisit the issue at a later time. By reserving the right to a subsequent 9 prudence review, and by limiting the scope of the ISRS audit to ISRS eligibility, the 10 legislature clearly intended to ease the burden of the audit in ISRS proceedings while 11 12 providing more contemporaneous recovery of these investments. The non-binding nature of the ISRS and the opportunity to review ISRS investments for prudence in a subsequent 13 14 rate case are also set out in the Commission's ISRS rules at 4 CSR 240-3.265(15).

15 Q. HOW MANY "NEW" WORK ORDERS DO YOU ANTICIPATE CLOSING IN

16

1

2 3

THE MONTHS OF JULY AND AUGUST?

A. For the Laclede operating unit, through June 2015 business, 216 ISRS projects and 17 associated work orders had been reflected in the ISRS filing. We anticipate 18 approximately 30 - 40 additional work orders will close that were not recurring from 19 prior months. This is similar to the number of work orders we have closed in the 20 "update" period in prior ISRS filings. For example, in GO-2015-0178, there were 41 21 new work orders in the update period. Similarly, there were 24 new work orders in the 22 23 update period in GR-2015-0026. For the Commission's convenience, I have attached as Schedule GWB-1 examples of specific work orders that will close with August 2015 24 business. As can be readily seen from these examples, these work orders can be 25

reviewed for ISRS eligibility in a relatively short amount of time. The Company anticipates that the results will be roughly the same for the updated information to be provided on September 14, 2015. MGE's updating experience is expected to be generally similar.

5 Q. HAS THE COMPANY MADE EFFORTS TO PROVIDE UPDATED 6 INFORMATION IN A TIMELY FASHION?

A. Yes. With the implementation of our new accounting system, we are now able to "close" 7 the business month days faster than previously. Additionally, being conscious of the 8 9 Staff's need to have adequate time to review such information, we have purposely filed our ISRS cases later in the month to accommodate Staff and OPC by providing more 10 time to audit the updated information. In this instance, filing our application on July 31, 11 2015 caused the Staff's 60 day statutory recommendation date to be October 2, 2015. 12 Since Laclede has or will provide its updated information to the Staff and OPC on August 13 14, 2015 and September 14, 2015, the Staff and OPC will have 7 weeks and 18 days, 14 respectively, to review the two relatively small batches of information prior to making 15 their recommendations. 16

Q. DO YOU HAVE ANY CONCERNS WITH THE MANNER IN WHICH OPC HAS
RAISED ITS ISSUES IN THE LACLEDE GAS ISRS FILINGS?

A. Yes, I do. In resolution of a dispute involving income taxes, Laclede Gas, Staff and OPC
reached an agreement under which Laclede Gas would reduce its ISRS request by half of
the value of the difference in approaches for calculating taxes, and in exchange Staff and
OPC would work to implement the Company's ISRS as soon as reasonably possible. In
this case alone, the Company has reduced its ISRS request by approximately \$600,000 to

honor this agreement. The approach taken by Laclede Gas is consistent with the approach 1 taken for taxes in rate cases, and so Laclede Gas feels this is a significant concession on 2 its part for which it reasonably expected the significant consideration of expedited 3 approval and effectiveness of its ISRS filings. Despite this agreement, OPC in a number 4 of recent ISRS case has either raised objections to well-established practices, such as 5 updating both ISRS additions and subtractions, or to the inclusion of costs, such as those 6 relating to regulator stations, that are clearly eligible for recovery through the ISRS 7 process. Often these objections have been raised months after the Company filed its 8 9 ISRS where such elements were included with the initial filings, but objections were not raised until "the eleventh hour" and have all resulted in delays in when the Company 10 obtains approval for its ISRS filings. In this case, the Company proposed a number of 11 alternatives for litigating the issues that have previously been raised by OPC in a way that 12 would provide at least some measure of expedited treatment in return for the significant 13 consideration the Company has given. Ultimately, Laclede Gas and Staff were able to 14 agree to a proposed schedule, which OPC continued to argue was too expedited since, 15 according to OPC, the Commission had until December 1, 2015 to approve an ISRS and 16 allow it to go into effect. Combined with its prior actions, OPC's contention in this 17 proceeding that there is no reason for the Commission to address and resolve Laclede 18 Gas' ISRS cases on any kind of expedited basis (together with its opposition to proposals 19 20 that would allow that to happen) constitutes a repudiation by OPC of its commitments under the agreement described above. Under such circumstances, OPC should not be 21 permitted to continue to benefit from a bargain that it is not reasonably upholding, and 22 23 instead seems to be bent on frustrating. For a discussion of the Company's merits on the

income tax issue, please see the testimony of James A. Fallert and Glenn W. Buck filed
in May 2004 in Case No. GO-2004-0443

3

Q. PLEASE SUMMARIZE YOUR TESTIMONY.

4 A. The Company believes the current process of updating the ISRS information fits squarely with the legislative intent, which was to allow more timely cost recovery of gas safety 5 investments and government mandated relocations under a targeted audit process that is 6 backstopped by a later review for prudence in a rate case. The provision of pro-forma 7 information on ISRS projects is consistent with the common practice of using such 8 information, as updated with actuals, in other rate proceedings. There is more than 9 adequate time to review such projects and meet the 60 day timeframe for a Staff 10 Recommendation regarding eligibility and accuracy. 11

12 Q. DOES THIS COMPLETE YOUR DIRECT TESTIMONY?

13 A. Yes.

eader Detail				
Work Order: 900310		Company:	Laclede Gas Company	
Work Order Title: Inst 2250F 2P Yale Ave Maplewood 1C		Business Segment: Distribution LDC 1		
Wo Type Description: WO-Replacement Mains & Services		Functional Class:	Distribution Plant	
Work Order Group:		Department Code:	10638	
Current Revision: 1		Department Description:	Construction - Region 1B -	Union
Funding Project: 3303L			Replacement of Dist Sys -	Laclede
Funding Project Desc: Replacement of Dis	,	Est. Annual Revenue:		
0	gible for CPI: yes	Reimbursement Type:		
Reason Code: Strategic		Retirement Type:		
WO Description:Install 2,250 feet of Lyndover PI. Work t work by the City of N	from Maplewood 1C is bein	g expedited due to street		
Major Location: Mass Property-Lac	lede	Statu	is: completed	
Asset Location: Laclede-St. Louis C	County			
Estimated Start Date: Aug 01, 2013	Estimated Completion	on Date: Sep 27, 2013 Es	stimated In-Service Date:	Sep 27, 2013
Notes:				
eason for Work (Justification)				

		Approva	als			
Level	Approver		Approval	Limit	Date Approv	ed
Operational Accounting	Muehlenkamp, Anne			\$0	7/17/2013	
Engineering Review-Dist	ዩ Hoeferlin, Craig			\$0	7/24/2013	
VP Field Operations	Reitz, Tom		\$7	5,000	7/26/2013	
Chief Operating Officer	Lindsey, Steve		\$50	0,000	7/30/2013	
		***** Unit E	stimate *****			
Utility Account		Additions	Removal Cost	Total Expenditures	Retirement Value	Salvage
376300-Mains - Plastic		\$131,047.79	\$0.00	\$131,047.79	\$0.00	\$0.0
Total Es	stimated Costs:	\$131,047.79	\$0.00	\$131,047.79	\$0.00	\$0.0

Header Detail						
Work Order: 002139		Company:	Laclede Gas Company			
Work Order Title: Inst 3278F 2P MLK -We	ellston 1B	Business Segment: Distribution LDC 1				
Wo Type Description: WO-Replacement Main	s & Services	Functional Class:	Distribution Plant			
Work Order Group:		Department Code: 10648				
Current Revision: 1	1	•	Construction - Region 1A -	Union		
Funding Project: 3303L		• •	Replacement of Dist Sys - I			
Funding Project Desc: Replacement of Dist Sy	vs - Laclede	Est. Annual Revenue:	\$0			
Eligible for AFUDC yes Eligible	e for CPI: yes	Reimbursement Type:	None			
Reason Code: System Integrity		Retirement Type:				
WO Description:Install 3278F 2P main of Transfers - 75. Wellston		ons. Abandon 4374F of va	r CI, ST & PI at the same loo	cation. Total Service		
Major Location: Mass Property-Laclede		Statu	s: completed			
Asset Location: Laclede-St. Louis Coun	ty					
Estimated Start Date: May 30, 2013	Estimated Completion Dat	e: Sep 30, 2013 Es	timated In-Service Date:	Sep 30, 2013		
Notes: Service Hub ID 26052						
Reason for Work (Justification)						
No Reason Provided						

Approvals					
Level	Approver	Approval Limit	Date Approved		
Operational Accounting	Muehlenkamp, Anne	\$0	7/5/2013		
Engineering Review-Dist	S Hoeferlin, Craig	\$0	7/8/2013		
VP Field Operations	Reitz, Tom	\$75,000	7/8/2013		
Chief Operating Officer	Lindsey, Steve	\$500,000	7/8/2013		

****	Unit	Estimate	*****

Utility Account	Additions	Removal Cost	Total Expenditures	Retirement Value	Salvage
376100-Mains - Steel	\$0.00	\$274.00	\$274.00	\$0.00	\$0.00
376200-Mains - Cast Iron	\$0.00	\$12,019.00	\$12,019.00	\$0.00	\$0.00
376300-Mains - Plastic	\$377,647.00	\$1,366.00	\$379,013.00	\$0.00	\$0.00
Total Estimated Costs:	\$377,647.00	\$13,659.00	\$391,306.00	\$0.00	\$0.00

ader Detail Work Order: 002140		Company: Laclede Gas Company				
Work Order Title: Inst 6894		Business Segment: Distribution LDC 1				
Wo Type Description: WO-Repl						
Work Order Group:						
Current Revision: 1		Department Description: Central - Construction (Retired)				
Funding Project: 3303L		Budget Description: Replacement of Dist Sys - Laclede				
Funding Project Desc: Replacen	nent of Dist Sys - Laclede	Est. Annual Revenue: \$0				
Eligible for AFUDC yes	Eligible for CPI: yes	Reimbursement Type: None				
Reason Code: System Ir	ntegrity	Retirement Type:				
	4F 2P main on Bertha Ave at vari - 97. Wellston-Phase 1A	ous locations. Abandon 6312F var CI & PL at the same locations. Total Servic				
Major Location: Mass Pro	perty-Laclede	Status: in service				
Asset Location: Laclede-S	St. Louis City					
Estimated Start Date: Apr 30, 2	013 Estimated Comp	letion Date: Nov 30, 2013 Estimated In-Service Date: Nov 30, 207				
Notes: Service H Received		15 - Follow up on F604 report for retirements - AMM				
ason for Work (Justification)						
Reason Provided						

Approvals				
Level	Approver	Approval Limit	Date Approved	
Operational Accounting	Muehlenkamp, Anne	\$0	7/5/2013	
Engineering Review-Dist	5 Hoeferlin, Craig	\$0	7/8/2013	
VP Field Operations	Reitz, Tom	\$75,000	7/8/2013	
Chief Operating Officer	Lindsey, Steve	\$500,000	7/8/2013	
President & CEO	Sitherwood, Suzanne	\$999,999,999,999	7/8/2013	

***** Unit Estimate *****					
Utility Account	Additions	Removal Cost	Total Expenditures	Retirement Value	Salvage
376200-Mains - Cast Iron	\$0.00	\$6,760.00	\$6,760.00	\$0.00	\$0.00
376300-Mains - Plastic	\$732,675.00	\$69.00	\$732,744.00	\$0.00	\$0.00
Total Estimated Costs:	\$732,675.00	\$6,829.00	\$739,504.00	\$0.00	\$0.00

Work Order: 900650)	Company: Laclede (Gas Company
Work Order Title: Inst 3290F 2P St Louis Hills Ph1A		Business Segment: Distribution	on LDC 1
Wo Type Description: WO-Replacement Mains & Services		Functional Class: Distribution	on Plant
Work Order Group:		Department Code: 10638	
Current Revision: 1		Department Description: Construct	ion - Region 1B - Union
Funding Project: 3303L		Budget Description: Replacem	nent of Dist Sys - Laclede
Funding Project Desc: Replacer	nent of Dist Sys - Laclede	Est. Annual Revenue:	
Eligible for AFUDC yes	Eligible for CPI: yes	Reimbursement Type: None	
Reason Code: Strategic		Retirement Type:	
	0 Ft of 2PL IP main on Wabash Ave, cement Program.	Bancroft Ave, and Winona Ave. Main is beir	ng installed as part of FY 2014 Ca
Major Location: Mass Pro	pperty-Laclede	Status: in servio	ce
Asset Location: Laclede-	St. Louis City		
Estimated Start Date: Apr 01, 2	014 Estimated Completi	on Date: Jun 30, 2014 Estimated In	-Service Date: Jun 30, 2014
	abandonment WO - 900654, Task 12 54 estimate moved to install WO.	340256	
ason for Work (Justification)			

Approvals			
Level	Approver	Approval Limit	Date Approved
Operational Accounting	Muehlenkamp, Anne	\$0	3/19/2014
Engineering Review-Dist	S Hoeferlin, Craig	\$0	3/28/2014
VP Field Operations	Reitz, Tom	\$75,000	3/28/2014
Chief Operating Officer	Lindsey, Steve	\$500,000	3/31/2014

*****	Unit	Estimate	****

Utility Account	Additions	Removal Cost	Total Expenditures	Retirement Value	Salvage
376200-Mains - Cast Iron	\$0.00	\$13,779.24	\$13,779.24	\$0.00	\$0.00
376300-Mains - Plastic	\$133,583.26	\$0.00	\$133,583.26	\$0.00	\$0.00
380200-Services - Plastic & Copper	\$251,701.57	\$0.00	\$251,701.57	\$0.00	\$0.00
Total Estimated Costs:	\$385,284.83	\$13,779.24	\$399,064.07	\$0.00	\$0.00

eader Detail				
Work Order: 900652		Company:	Laclede Gas Company	
Work Order Title: Inst 4435F	2P St Louis Hills Ph1B	Business Segment:	Distribution LDC 1	
Wo Type Description: WO-Replace	cement Mains & Services	Functional Class:	Distribution Plant	
Work Order Group:		Department Code:	10638	
Current Revision: 1		Department Description:	Construction - Region 1B -	Union
Funding Project: 3303L		Budget Description:	Replacement of Dist Sys -	Laclede
Funding Project Desc: Replaceme	ent of Dist Sys - Laclede	Est. Annual Revenue:		
Eligible for AFUDC yes	Eligible for CPI: yes	Reimbursement Type:	None	
Reason Code: Strategic		Retirement Type:		
	Ft of 2PL IP main on Wabash Ave, Y 2014 Cast Iron Replacement Pro		and Lindenwood Pl. Main is	being replaced as
Major Location: Mass Prope	erty-Laclede	Statu	is: completed	
Asset Location: Laclede-St.	Louis City			
Estimated Start Date: Jul 01, 2014	4 Estimated Completion	on Date: Sep 30, 2014 Es	timated In-Service Date:	Sep 30, 2014
Notes: Related Aba WO 900655	and WO 900655 5 COR estimate moved to install W	0.		
eason for Work (Justification)				
(,				

Approvals			
Level	Approver	Approval Limit	Date Approved
Operational Accounting	Muehlenkamp, Anne	\$0	4/7/2014
Engineering Review-Dist	5 Hoeferlin, Craig	\$0	4/9/2014
VP Field Operations	Reitz, Tom	\$75,000	4/9/2014
Chief Operating Officer	Lindsey, Steve	\$500,000	4/14/2014

****	Unit	Estimate	*****

Utility Account	Additions	Removal Cost	Total Expenditures	Retirement Value	Salvage
376300-Mains - Plastic	\$150,888.30	\$0.00	\$150,888.30	\$0.00	\$0.00
380200-Services - Plastic & Copper	\$289,703.36	\$0.00	\$289,703.36	\$0.00	\$0.00
Total Estimated Costs:	\$440,591.66	\$0.00	\$440,591.66	\$0.00	\$0.00

leader Detail					
Work Order: 9	00476		Company:	Laclede Gas Company	
Work Order Title: In:	st 3350F 6P Ivory		Business Segment: Distribution LDC 1 Functional Class: Distribution Plant Department Code: 10638		
Wo Type Description: W	O-Replacement Mair	ns & Services			
Work Order Group:					
Current Revision: 1			Department Description:	Construction - Region 1B -	Union
Funding Project: 33	Funding Project: 3304L Funding Project Desc: Replacement Header Main - Laclede Eligible for AFUDC yes Eligible for CPI: yes		Budget Description:	Replacement Header Main	- Laclede
Funding Project Desc: Re			Est. Annual Revenue:		
Eligible for AFUDC ye			Reimbursement Type: None		
Reason Code: Strategic			Retirement Type:		
	tall 3350 Ft of 6PL IF placement Program.	e main on Ivory St from Koel	n Ave to River Des Peres. M	ain to be installed as part of	the FY14 Cast Iron
Major Location: Ma	ass Property-Laclede)	Statu	s: completed	
Asset Location: La	clede-St. Louis Cour	nty			
Estimated Start Date: Ju	Il 01, 2014	Estimated Completion D	ate: Sep 30, 2014 Es	timated In-Service Date:	Sep 30, 2014
Notes:					

Approvals			
Level	Approver	Approval Limit	Date Approved
Operational Accounting	Muehlenkamp, Anne	\$0	5/18/2014
Engineering Review-Dist	S Hoeferlin, Craig	\$0	5/28/2014
VP Field Operations	Reitz, Tom	\$75,000	5/28/2014
Chief Operating Officer	Lindsey, Steve	\$500,000	5/30/2014

****	Unit	Estimate	****
	Unit	Loundle	

Utility Account	Additions	Removal Cost	Total Expenditures	Retirement Value	Salvage
376200-Mains - Cast Iron	\$0.00	\$8,038.69	\$8,038.69	\$0.00	\$0.00
376300-Mains - Plastic	\$321,404.22	\$0.00	\$321,404.22	\$0.00	\$0.00
Total Estimated Costs:	\$321,404.22	\$8,038.69	\$329,442.91	\$0.00	\$0.00

ader Detail Work Order: 900271		Company: Laclede Gas Company			
Work Order Title: Inst 2646	F 2P Walnut Park Ph5C	Business Segment: Distribution LDC 1			
Wo Type Description: WO-Repl	acement Mains & Services	Functional Class: Distribution Plant Department Code: 10648			
Work Order Group:					
Current Revision: 1		Department Description: Construction - Region 1A - Union			
Funding Project: 3303L Funding Project Desc: Replacement of Dist Sys - Laclede Eligible for AFUDC yes Reason Code: Strategic		Budget Description: Replacement of Dist Sys - Laclede			
		Est. Annual Revenue:			
		Reimbursement Type: None Retirement Type:			
	6 Ft of 2PL IP main on Saloma Ave Cast Iron Main Replacement Progra	, Lillian Ave, Laura Ave, and Riverview Blvd. Main is being installed as part c m.			
Major Location: Mass Pro	perty-Laclede	Status: completed			
Asset Location: Laclede-S	St. Louis City				
Estimated Start Date: Jun 23, 2	014 Estimated Comple	tion Date: Sep 26, 2014 Estimated In-Service Date: Sep 26, 201			
	bandonment WO 900563, Task 12 63 COR estimate moved to install ¹				
ason for Work (Justification)					

Approvals					
Level	Approver	Approval Limit	Date Approved		
Operational Accounting	Muehlenkamp, Anne	\$0	5/13/2014		
Engineering Review-Dist 5 Hoeferlin, Craig		\$0	5/13/2014		
VP Field Operations	Reitz, Tom	\$75,000	5/14/2014		
Chief Operating Officer	Lindsey, Steve	\$500,000	5/30/2014		

*****	Unit Estima	te *****

Utility Account	Additions	Removal Cost	Total Expenditures	Retirement Value	Salvage
376200-Mains - Cast Iron	\$0.00	\$12,517.43	\$12,517.43	\$0.00	\$0.00
376300-Mains - Plastic	\$86,699.90	\$0.00	\$86,699.90	\$0.00	\$0.00
380200-Services - Plastic & Copper	\$92,964.51	\$0.00	\$92,964.51	\$0.00	\$0.00
Total Estimated Costs:	\$179,664.41	\$12,517.43	\$192,181.84	\$0.00	\$0.00

Work Order Title: Inst 2180F 6P Union Header Main Business Segment Wo Type Description: WO-Replacement Mains & Services Functional Class Work Order Group: Department Code Current Revision: 1 Department Description	Distribution Plant 10648 Construction - Region 1A - Union Replacement Header Main - Laclede None
Wo Type Description: WO-Replacement Mains & Services Functional Class Work Order Group: Department Code Current Revision: 1 Department Description Funding Project: 3304L Budget Description Funding Project Desc: Replacement Header Main - Laclede Est. Annual Revenue Eligible for AFUDC yes Eligible for CPI: yes Reimbursement Type Reason Code: Strategic Retirement Type WO Description:Install 2,180ft of 6PLIP main on Union Blvd between Natural Bridge Ave and Te	Distribution Plant 10648 Construction - Region 1A - Union Replacement Header Main - Laclede None
Work Order Group: Department Code Current Revision: 1 Department Description Funding Project: 3304L Budget Description Funding Project Desc: Replacement Header Main - Laclede Est. Annual Revenue Eligible for AFUDC yes Eligible for CPI: yes Reason Code: Strategic Retirement Type WO Description:Install 2,180ft of 6PLIP main on Union Blvd between Natural Bridge Ave and Te	10648 Construction - Region 1A - Union Replacement Header Main - Laclede None
Current Revision: 1 Department Description Funding Project: 3304L Budget Description Funding Project Desc: Replacement Header Main - Laclede Est. Annual Revenue Eligible for AFUDC yes Eligible for CPI: yes Reimbursement Type Reason Code: Strategic Retirement Type WO Description:Install 2,180ft of 6PLIP main on Union Blvd between Natural Bridge Ave and Te	Construction - Region 1A - Union Replacement Header Main - Laclede None
Current Revision: 1 Department Description Funding Project: 3304L Budget Description Funding Project Desc: Replacement Header Main - Laclede Est. Annual Revenue Eligible for AFUDC yes Eligible for CPI: yes Reimbursement Type Reason Code: Strategic Retirement Type WO Description:Install 2,180ft of 6PLIP main on Union Blvd between Natural Bridge Ave and Te	Replacement Header Main - Laclede None
Funding Project Desc: Replacement Header Main - Laclede Est. Annual Revenue Eligible for AFUDC yes Eligible for CPI: yes Reimbursement Type Reason Code: Strategic Retirement Type WO Description:Install 2,180ft of 6PLIP main on Union Blvd between Natural Bridge Ave and Te	None
Eligible for AFUDC yes Eligible for CPI: yes Reimbursement Type Reason Code: Strategic Retirement Type WO Description:Install 2,180ft of 6PLIP main on Union Blvd between Natural Bridge Ave and Te	None
Reason Code: Strategic Retirement Type WO Description: Install 2,180ft of 6PLIP main on Union Blvd between Natural Bridge Ave and Te	
WO Description:Install 2,180ft of 6PLIP main on Union Blvd between Natural Bridge Ave and Te	
	united Deilused (neutle of Duction Atta). I leaden
	minal Railroad (north of Brown Ave). Header
Major Location: Mass Property-Laclede State	IS: completed
Asset Location: Laclede-St. Louis City	
Estimated Start Date: Jul 01, 2014 Estimated Completion Date: Sep 30, 2014 Estimated Completion Date: Sep 30, 2014	stimated In-Service Date: Sep 30, 2014
Notes:	

		Approva	als			
Level	Approver		Approval I	Limit	Date Approv	ed
Operational Accounting	Muehlenkamp, Anne			\$0	6/29/2014	
Engineering Review-Dist 5 Hoeferlin, Craig				\$0	7/1/2014	
VP Field Operations	Reitz, Tom	\$75,000 7/1/2014				
Chief Operating Officer	Lindsey, Steve	\$500,000 7/16/2014				
		***** Unit Es	stimate *****			
Utility Account		Additions	Removal Cost	Total Expenditures	Retirement Value	Salvage
376300-Mains - Plastic		\$231,599.20	\$0.00	\$231,599.20	\$0.00	\$0.0

\$0.00

\$231,599.20

\$231,599.20

Total Estimated Costs:

\$0.00

\$0.00

Header Detail			
Work Order: 900896	Company	/: Laclede Gas Company	
Work Order Title: Repl w/ 2990F 2P 4P Ma	aple Business Segmen	t: Distribution LDC 1	
Wo Type Description: WO-Replacement Mains	s & Services Functional Class	: Distribution Plant	
Work Order Group:	Department Code	: 10648	
Current Revision: 1	Department Description	: Construction - Region 1A - Union	
Funding Project: 3303L	Budget Description	: Replacement of Dist Sys - Laclede	
Funding Project Desc: Replacement of Dist Sys	s - Laclede Est. Annual Revenue):	
Eligible for AFUDC yes Eligible	for CPI: yes Reimbursement Type	e: None	
Reason Code: System Integrity	Retirement Type:		
	P and 350 Ft. of 4" PL IP and abandon 280 Ft. of 6" S atalpa. Main is being replaced as part of the FY15 Cas		
Major Location: Mass Property-Laclede	Stat	tus: in service	
Asset Location: Laclede-St. Louis City			
Estimated Start Date: Feb 16, 2015	Estimated Completion Date: May 29, 2015 E	stimated In-Service Date: May 29, 2015	
Notes: Main is being replaced a	as part of the FY15 Cast Iron Replacement Program.		
Reason for Work (Justification)			

Approvals					
Level	Approver	Approval Limit	Date Approved		
Operational Accounting	Muehlenkamp, Anne	\$0	12/18/2014		
Engineering Review-Dist	5 Hoeferlin, Craig	\$0	1/2/2015		
VP Field Operations	Reitz, Tom	\$500,000	1/2/2015		

***** Unit Estimate *****					
Utility Account	Additions	Removal Cost	Total Expenditures	Retirement Value	Salvage
376100-Mains - Steel	\$8.27	\$2,669.50	\$2,677.77	\$0.00	\$0.00
376200-Mains - Cast Iron	\$0.00	\$15,590.57	\$15,590.57	\$0.00	\$0.00
376300-Mains - Plastic	\$236,257.00	\$0.00	\$236,257.00	\$0.00	\$0.00
380200-Services - Plastic & Copper	\$112,422.20	\$0.00	\$112,422.20	\$0.00	\$0.00
Total Estimated Costs:	\$348,687.47	\$18,260.07	\$366,947.54	\$0.00	\$0.00

	Header Detail					
	Work Order	: 900962		Company:	Laclede Gas Company	
	Work Order Title	: Inst 5842F 6P	4P Newstead -Header	Business Segment:	Distribution LDC 1	
	Wo Type Description	: WO-Relocation	n Mains LGC	Functional Class:		
	Work Order Group	:		Department Code:	10648	
	Current Revision	:1		Department Description:	Construction - Region 1A -	Union
	Funding Project	: 3304L		Budget Description:	Replacement Header Main	- Laclede
	Funding Project Desc	•		Est. Annual Revenue:		
	Eligible for AFUD	•	Eligible for CPI: yes	Reimbursement Type:	None	
	Reason Code	: Strategic		Retirement Type:		
			of 6in PLIP main and 235 t of the FY15 Header Mai	Ft of 4in PLIP main on Newstead Ave fr n Installation Program.	rom Evans Ave to Lindell Blv	vd. Main to be
	Major Location	: Mass Property	-Laclede	Statu	s: completed	
	Asset Location	: Laclede-St. Lo	uis City			
	Estimated Start Date	: Mar 02, 2015	Estimated Cor	npletion Date: Sep 30, 2015 Es	timated In-Service Date:	Sep 30, 2015
	Notes	Main to be inst	alled as part of the FY15	Header Main Installation Program.		
L	Reason for Work (Justifie	cation)				

		Approva	als			
Level	Approver		Approval L	.imit	Date Approve	ed
Operational Accounting	Muehlenkamp, Anne			\$0	12/18/2014	
Engineering Review-Dist	۲ Hoeferlin, Craig			\$0	1/2/2015	
VP Field Operations	Reitz, Tom		\$500),000	1/2/2015	
Chief Operating Officer	Lindsey, Steve		\$2,000),000	1/5/2015	
		***** Unit Es	stimate *****			
Utility Account		Additions	Removal Cost	Total Expenditures	Retirement Value	Salvage

Utility Account	Additions	Removal Cost	Expenditures	Value	Salvage
376300-Mains - Plastic	\$519,632.80	\$0.00	\$519,632.80	\$0.00	\$0.00
Total Estimated Costs:	\$519,632.80	\$0.00	\$519,632.80	\$0.00	\$0.00

Company: Laclede Gas Company
Business Segment: Distribution LDC 1
Functional Class: Distribution Plant
Department Code: 10638
Department Description: Construction - Region 1B - Union
Budget Description: Replacement Header Main - Laclede
Est. Annual Revenue:
Reimbursement Type: None
Retirement Type:
PL IP main on Hampton Ave and Sulphur Ave in between Eichelberger St and
Status: completed
on Date: Sep 30, 2015 Estimated In-Service Date: Sep 30, 2015
r Main Installation Program.

		Approva	ls			
Level	Approver		Approval L	imit	Date Approve	d
Operational Accounting	Muehlenkamp, Anne			\$0	12/18/2014	
Engineering Review-Dist	۶ Hoeferlin, Craig			\$0	1/2/2015	
VP Field Operations	Reitz, Tom		\$500	,000	1/2/2015	
Chief Operating Officer	Lindsey, Steve		\$2,000	,000	1/5/2015	
		***** Unit Es	timate *****			
Utility Account		Additions	Removal Cost	Total Expenditures	Retirement Value	Salvage

Utility Account	Additions	Removal Cost	Expenditures	Value	Salvage
376300-Mains - Plastic	\$507,978.29	\$0.00	\$507,978.29	\$0.00	\$0.00
Total Estimated Costs:	\$507,978.29	\$0.00	\$507,978.29	\$0.00	\$0.00

Hoa	ader Detail					
1100	Work Order:	900978		Company:	Laclede Gas Company	
	Work Order Title: Inst 3875F 8P Brannon Ave-Header		Business Segment: Distribution LDC 1			
	Wo Type Description:	WO-Replacem	ent Mains & Services	Functional Class:	Distribution Plant	
	Work Order Group:			Department Code:	10638	
	Current Revision:	1		Department Description:	Construction - Region 1B -	Union
	Funding Project:	3304L		Budget Description:	Replacement Header Main	- Laclede
F	Funding Project Desc:	Replacement H	leader Main - Laclede	Est. Annual Revenue:		
	Eligible for AFUDC	yes	Eligible for CPI: yes	Reimbursement Type:	None	
	Reason Code:	Strategic		Retirement Type:		
			f 8PL IP header main on Brar Replacement Program.	non Ave from Southwest Ave to F	yler Ave. Main to be installed	d as part of the
	Major Location:	Mass Property-	Laclede	Statu	is: in service	
	Asset Location:	Laclede-St. Lou	uis City			
	Estimated Start Date:	Mar 02, 2015	Estimated Complet	tion Date: Sep 30, 2015 Es	timated In-Service Date:	Sep 30, 2015
	Notes:	Main to be insta	alled as part of the FY15 Cast	Iron Replacement Program.		
Rea	ason for Work (Justific	ation)				
1						

		Approva	als			
Level	Approver		Approval L	.imit	Date Approv	ed
Operational Accounting	Muehlenkamp, Anne			\$0	12/18/2014	
Engineering Review-Dist	۶ Hoeferlin, Craig			\$0	1/2/2015	
VP Field Operations	Reitz, Tom		\$500),000	1/2/2015	
Chief Operating Officer	Lindsey, Steve		\$2,000),000	1/5/2015	
		***** Unit E	stimate *****			
Utility Account		Additions	Removal Cost	Total Expenditures	Retirement Value	Salvage

Utility Account	Additions	Removal Cost	Expenditures	Value	Salvage
376300-Mains - Plastic	\$549,979.08	\$0.00	\$549,979.08	\$0.00	\$0.00
Total Estimated Costs:	\$549,979.08	\$0.00	\$549,979.08	\$0.00	\$0.00

Header Detail	
Work Order: 900095	Company: Laclede Gas Company
Work Order Title: Rel w/ 350F 8P Mason Rd Bridge #211	Business Segment: Distribution LDC 1
Wo Type Description: WO-Relocation Mains LGC	Functional Class: Distribution Plant
Work Order Group:	Department Code: 10648
Current Revision: 1	Department Description: Construction - Region 1A - Union
Funding Project: 3403L	Budget Description: Relocation of Dist Sys - Laclede
Funding Project Desc: Relocation of Dist Sys - Laclede	Est. Annual Revenue:
Eligible for AFUDC yes Eligible for CPI: yes	Reimbursement Type: None
Reason Code: Government Request	Retirement Type:
WO Description:Install 350ft of 8in PLIP main on Mason Rd bet the same location. This job is non-reimbursable	ween Bellerive Springs Dr and Mulberry Row. Abandon 300ft of 8in STIP main at e.
Major Location: Mass Property-Laclede	Status: completed
Asset Location: Laclede-St. Louis County	
Estimated Start Date: Aug 25, 2014 Estimated Completion	on Date: Oct 10, 2014 Estimated In-Service Date: Oct 10, 2014
Notes: Relocation is necessary due to road improvem	nents.
Reason for Work (Justification)	

Approvals					
Level	Approver	Approval Limit	Date Approved		
Operational Accounting	Muehlenkamp, Anne	\$0	9/10/2014		
Engineering Review-Dist	5 Hoeferlin, Craig	\$0	9/15/2014		
VP Field Operations	Reitz, Tom	\$75,000	9/15/2014		
Chief Operating Officer	Lindsey, Steve	\$500,000	10/6/2014		

*****	Unit	Estimate	*****
-------	------	----------	-------

Utility Account	Additions	Removal Cost	Total Expenditures	Retirement Value	Salvage
376100-Mains - Steel	\$0.00	\$24,122.32	\$24,122.32	\$0.00	\$0.00
376300-Mains - Plastic	\$72,306.56	\$0.00	\$72,306.56	\$0.00	\$0.00
Total Estimated Costs:	\$72,306.56	\$24,122.32	\$96,428.88	\$0.00	\$0.00

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 Infrastructure System Replacement Surcharge in its Laclede Gas Service Territory

File No. G0-2015-0341

AFFIDAVIT

))))

) STATE OF MISSOURI SS. CITY OF ST. LOUIS

Glenn W. Buck, of lawful age, being first duly sworn, deposes and states:

1. My name is Glenn W. Buck. My business address is 700 Market Street, St. Louis, MO 63101 and I am the Director, Regulatory and Finance for Laclede Gas Company.

2. Attached hereto and made a part hereof for all purposes is my direct testimony on behalf of Laclede Gas Company.

3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my knowledge and belief.

<u>Henn Buck</u> Glenn W. Buck

Subscribed and sworn to before me this 28 day of August, 2015.

Marcia a Spingler Notary Public

Janannannan
MARCIA A. SPANGLER
Notary Public - Notary Seal
STATE OF MULARY Seal
STATE OF MISSOURI
St. Louis County
My Commission Expires: Sept. 24, 2018
My Commission Expires: Sept. 24, 2018 Commission # 14630361