

**Exhibit No.:**  
**Issue:** Test Year and Update, Accounting Schedules, Cash Working Capital, Capital Structure, Income Statement Adjustments, True-up Reconciliation Mechanism  
**Witness:** Glenn W. Buck  
**Type of Exhibit:** Direct Testimony  
**Sponsoring Party:** Laclede Gas Company  
**Case No.:** GR-2013-0171  
**Date Prepared:** December 21, 2012

**LACLEDE GAS COMPANY**

**GR-2013-0171**

**DIRECT TESTIMONY**

**OF**

**GLENN W. BUCK**

**DECEMBER 2012**

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**SCHEDULE GWB-D1 - TRUE-UP RECOVERY MECHANISM**

**DIRECT TESTIMONY OF GLENN W. BUCK**

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- Q. Please state your name and business address.
- A. My name is Glenn W. Buck, and my business address is 720 Olive St., St. Louis, Missouri, 63101.
- Q. What is your present position?
- A. I am presently employed as Manager, Financial Services, for Laclede Gas Company (“Laclede” or “Company”).
- Q. Please state how long you have held your position and briefly describe your responsibilities.
- A. I was appointed to my present position in March, 1999. In this position, I am responsible for the financial aspects of rate matters generally, including financial analysis and planning. I am also responsible for monitoring regulatory trends and developments.
- Q. What was your experience with the Company prior to becoming Manager, Financial Services?
- A. I joined Laclede in August, 1986, as a Budget Analyst in the Budget Department. I was promoted to Senior Budget Analyst in June, 1988, and transferred to the Financial Planning Department in December, 1988 as an Analyst. I was promoted to Senior Analyst in February, 1990, Assistant Manager in February, 1994, and Manager in January 1996. I acted in that capacity until being appointed to my current position.
- Q. What is your educational background?
- A. I graduated from the University of Missouri - Columbia, in 1984, with a Bachelor of Science degree in Business Administration.
- Q. Have you previously filed testimony before this Commission?

1 A. Yes, I have, in Case Nos. GR-94-220, GR-96-193, GR-99-315, GR-2001-629,  
2 GT-2001-329, GR-2002-356, GO-2004-0443, GR-2005-0284, GR-2007-0208, GR-2010-  
3 0171, GT-2009-0026, ER-2010-0036, GC-2011-0006, GC-2011-0098, and GO-2012-  
4 0363. Further, I provided oral testimony before the Commission regarding the  
5 Infrastructure System Replacement Surcharge rulemaking in Case No. AX-2004-0090.

6 **PURPOSE OF TESTIMONY**

7 Q. What is the purpose of your testimony?

8 A. The purpose of my testimony is to present evidence to the Commission concerning the  
9 following:

- 10 1. The Company's calculation of cash working capital;
- 11 2. The capital structure that the Company recommends be used in this proceeding;
- 12 3. Income statement adjustments related to our wages and salaries, property and  
13 liability insurance, injuries and damages, credit card fees and an Accounting  
14 Authority Order ("AAO") related to the same;
- 15 4. The Company's recommended rate of return and return on equity as reflected in  
16 the proposed tariffs; and,
- 17 5. Company proposals relating to an AAO for environmental remediation costs and  
18 a mechanism for compensating the Company or customers for any over or under-  
19 recoveries that occur between the time financial figures are last updated or trued-  
20 up and the dates rates become effective.

21 Q. Please list the schedules you are sponsoring.

22 A. The following schedules were prepared by me or under my supervision:

1 Schedule 2. This schedule supports the calculation of the Company's cash working  
2 capital.

3 Schedule 3. This schedule provides information regarding the Company's capital  
4 structure and includes calculations of the embedded cost of long-term debt.

5 Schedule 4. This contains the income statement for the test year, a summary of  
6 normalization and annualization adjustments, and the resulting pro forma income.

7 Schedule 5. This contains details of the adjustments that are summarized on Schedule 4,  
8 and which are sponsored by various Company witnesses.

9 Schedule 6, sponsored by Company witness Christopher Reck, contains the calculation of  
10 income taxes included on Schedule 4.

11 Schedule 7. This schedule shows the rate of return and the related return on common  
12 equity at proposed rate levels based on an original cost rate base.

### 13 **CASH WORKING CAPITAL**

14 Q. Please discuss Schedule 2.

15 A. Schedule 2 is a summary schedule showing the computation of cash working capital  
16 required for payment of operating expenses.

17 Q. What is "cash working capital?"

18 A. Cash working capital is the average amount of capital which must be provided by  
19 investors in the Company for the payment of bills, payrolls and other items before the  
20 time-corresponding revenues are received from our customers. Cash working capital is  
21 included in rate base in order to provide a return allowance for this investment  
22 requirement, which is just as essential to the operation of a utility as are the more tangible  
23 physical plant components of rate base.

1 Q. How does the Company determine the amount of cash working capital to reflect in rate  
2 base?

3 A. Since 1978, the Company's cash working capital amount has been determined by  
4 performing a "lead-lag" study. As used in this context, "lead" refers to an advance  
5 payment for goods or services, such as amounts paid for postage in advance of mailing,  
6 while "lag" refers to a payment made or received by Laclede after the receipt or  
7 rendering of goods or services by the Company or our vendors. Since our customers pay  
8 their gas bills after we render service, I refer to "revenue lag time" in my study. The vast  
9 majority of expense items are paid some time after the actual rendering of goods and  
10 services to Laclede, so most often I also refer to "expense lag time." Comparisons of our  
11 revenue lag time to the lag time for various items of expense results in "net lead" or "net  
12 lag" times, depending on whether the expense lag (i.e., the time between when Laclede  
13 receives a good or service and pays for that good or service) is longer or shorter than the  
14 revenue lag (i.e., the time between when Laclede provides a good or service and receives  
15 payment for that good or service). For the most part, the expense lag is shorter than the  
16 revenue lag, meaning that expenses are generally paid before revenue is received,  
17 resulting in a net lag time for the Company.

18 Q. How is the lead-lag study performed?

19 A. The lead-lag study seeks to determine, on average, the net amount of funds required to  
20 pay the expenses incurred by the Company for the day-to-day utility operations before  
21 the related revenues are received. This is accomplished by calculating: (1) the lag time  
22 taken by the customers of the Company for the payment of revenues; and, (2) the lag time  
23 taken by the Company for the payment of expenses to outside suppliers and employees.

1 Each of these determinations is in reference to the same starting point - the rendering of  
2 service. An overall revenue lag time is then determined by combining data for various  
3 items of utility operating revenues. The lag time for each category of operating expenses  
4 is subtracted from this overall revenue lag time, and the resultant net lag (or net lead)  
5 time, in days, is multiplied by daily expense for the category and reflected in Schedule 2.  
6 The resultant net lag (or net lead) time is multiplied by daily expense to derive the  
7 average cash working capital required from (or available to) the Company's investors for  
8 each category. These computations are combined to determine the cash working capital  
9 required from the Company's investors. This total, as shown at the bottom of Schedule 2,  
10 is the amount of cash working capital I am sponsoring for inclusion in rate base.

11 Q. What time period was utilized to calculate the expense lag times used in Schedule 2?

12 A. The time period utilized in the Cash Working Capital study was based off of the period  
13 ended September 30, 2010, with expense levels based on the September, 2012 expenses,  
14 as adjusted. The update of the study is based on an agreement of the parties to GR-2010-  
15 0171 to update the lag levels.

16 Q. Please explain in greater detail how the overall revenue lag time was determined.

17 A. The revenue lag time total reflects four distinct lag times for four classes of revenue: (1)  
18 customer bills for the distribution of natural gas to traditional sales customers; (2)  
19 transportation customer bills; (3) incidental oil sales; and, (4) late payment charges. Each  
20 respective lag time is weighted into the overall revenue lag time proportionately, based  
21 on revenues. Of these, customer bills to sales customers constitute the most significant  
22 item. This total is comprised of three time periods: one-half of the average service

1 period; the average time between meter reading and billing; and, the average time  
2 between billing and payment.

3 Q. How were these time periods determined?

4 A. The average service period was computed by listing the scheduled number of days in  
5 each monthly billing period by cycle and deriving an average period by month. The  
6 twelve average periods during the twelve months ended September, 2010 were weighted  
7 according to actual revenues over the same months to calculate a weighted average  
8 service period, which was, in turn, divided by two to yield the figure shown on the  
9 schedule.

10 The average time between billing and payment was calculated using a turnover  
11 ratio analysis. The analysis involved dividing average daily billings into the average  
12 receivable balance to yield the number of days of billing included in receivables.  
13 Receivables for the twelve months ended September 2010 were used. Revenues and  
14 other billing items are an average of the twelve months ended August 2010 and  
15 September 2010. The resulting payment time is shown.

16 Q. Please explain your use of average billing items for the twelve months ended August  
17 2010 and September 2010.

18 A. By averaging the twelve months ended August 2010 with the twelve months ended  
19 September, 2010 I am giving half-weight to billings during August 2009, full-weight to  
20 billings for September 2009 through August 2010, and half-weight to billings during  
21 September 2010. This combination of revenues and other billing is more closely related  
22 to the receivables I am using than would be a simple twelve month total. In order to  
23 properly determine the length of time certain items (revenue billings) remain unpaid (as



1 receivable balances), it is in many cases inappropriate to divide receivables for a  
2 particular period by the billings for the same period in that such a method often does not  
3 recognize payment of the latest billings. Such is the case here.

4 Q. How did you determine revenue lag time for transportation customer bills?

5 A. The accounts of these customers were individually analyzed to derive daily receivables  
6 data. This data was combined to determine the overall lag time for the class. The lag  
7 time for incidental oil sales was computed in a similar fashion. The revenue lag time for  
8 late payment charges consists solely of the payment time derived for our customers.

9 Q. Is your determination of a revenue lag based on a sample of customers?

10 A. No. Unlike the study of expense lags, the revenue lag time is based on the actual history  
11 of customer billing and payment activity for the twelve months ended September 2010  
12 for all of Laclede's customers. As stated earlier in my testimony, it was determined based  
13 on an analysis of actual revenue billings and our accounts receivable balances on a daily  
14 basis.

15 Q. The results of your revenue lag study indicate that sales customers, on average, are  
16 paying 33.4 days or nearly five full weeks, after the bill is mailed. Is this reasonable?

17 A. Yes. Although the tariffs require customers to pay their bills within 15 days (commercial  
18 and industrial customers) or 21 days (residential customers), the results of the study are  
19 not inconsistent with expectations. Rather, they are perfectly reasonable. Obviously,  
20 some customers are paying after the required dates as witnessed by the revenues for late  
21 payment charges included in our operating revenues. Far more significant, however, is  
22 the fact that many of our customers are on special payment plans due to Cold Weather  
23 Rule requirements mandated by this Commission. Many of these customers maintain

1 significant outstanding balances while repaying the Company over significant extended  
2 periods of time.

3 Q. Are there any other circumstances which would lengthen the lag time beyond tariffed due  
4 dates?

5 A. Unfortunately, and inevitably, there are some customers who never pay the amounts  
6 owed and these amounts eventually become uncollectible accounts. From the time these  
7 amounts are billed until the time they are written off, approximately 7 months later, they  
8 are included in the accounts receivable balance and have the effect of seemingly driving  
9 up the revenue lag. Laclede has taken this impact into account, however, by including an  
10 adjustment in the study to account for the six month period of time these accounts reside  
11 in the receivable balances prior to the date the accounts are charged off as uncollectible.  
12 This method of calculation is consistent with past treatment of uncollectible accounts for  
13 ratemaking purposes (based on net write-offs). Given this and the impact of the  
14 customers who, pursuant to the special payment plans previously discussed, are paying  
15 for gas service over periods which can exceed 365 days, it is easy to understand how the  
16 average revenue lag for all sales customers would be over 33 days.

17 Q. Has the Commission previously reviewed the use of an accounts receivable turnover  
18 analysis as an appropriate methodology for use in a lead-lag study?

19 A. Yes. In Southwestern Bell Telephone Company Case No. TC-93-224, the Commission  
20 determined that a calculation of revenue lag, based on a receivable turnover analysis on  
21 all customer accounts, was more appropriate than the alternative methods submitted in  
22 that case, including methods that utilized sampling. Further, in a more recent Laclede  
23 rate case, GR-99-315, the Commission again confirmed the validity of this methodology.

1 Q. What amount of cash working capital are you sponsoring for inclusion in rate base?

2 A. This amount is shown on the bottom of Schedule 2.

3 Q. Does this complete your testimony with respect to cash working capital?

4 A. Yes, it does. It should be noted, however, that the revenue lag was based on data for the  
5 period ended in September, 2010 to be in synchronization with the expense lags. The  
6 Company is amenable to updating the revenue lag for the period ended September 2012 if  
7 the parties so desire.

8 **CAPITAL STRUCTURE**

9 Q. Please explain Schedule 3.

10 A. Schedule 3 details the elements of Laclede Gas' capital structure and calculates certain  
11 embedded costs for the various kinds of capital used to finance the Company's provision  
12 of utility service. Page 1 of Schedule 3 shows the capital structure of Laclede Group, the  
13 parent company of Laclede Gas, at September 30, 2012. The capital structure  
14 components consist of common equity and long-term debt. Schedule 3 contains the  
15 adjusted two-component capital structure. Short-term debt was not included in the  
16 capital structure because the average level of construction work in progress, underground  
17 storage inventories, propane, margin calls on our multi-year hedging program, and  
18 deferred gas costs subject to PGA carrying costs (none of which are included in base  
19 rates) exceeded the average level of short-term debt outstanding during the test year.  
20 Page 2 of Schedule 3 shows the embedded cost of long-term debt including the forward  
21 debt placements of debt that will settle at Laclede Group in December, 2012 and at  
22 Laclede Gas in March, 2013.

1 Q. Are you requesting that these capital structure components be updated through July 31,  
2 2013?

3 A. Yes. The Company is requesting an update of all elements of the capital structure.

4 **TEST YEAR, UPDATE, and TRUE-UP**

5 Q. What test period has Laclede used in this filing?

6 A. We have used the Company's actual operating results as recorded on the books for the  
7 twelve months ended September 30, 2012, as a starting point. As is usually done in rate  
8 cases, we have made adjustments to this period to reflect normal operations. We have  
9 also "annualized" certain items. This means that we have made adjustments to reflect the  
10 status of the item at the end of the period as though it existed for twelve months. We have  
11 made other adjustments to provide for changes which have occurred since September 30,  
12 2012 and to provide for reasonable changes which will be known and measurable by  
13 March 31, 2013, or, in certain instances, July 31, 2013. These adjustments to the test  
14 period reflect data that are more contemporaneous to the time when rates will go into  
15 effect.

16 Q. Why was the historical test year ending September 30, 2012 selected?

17 A. This period represented the most recent annual period ending in a quarter for which  
18 actual booked results were available prior to this filing as well as the most recent results  
19 that were available in sufficient time to prepare the filing.

20 Q. Would it be appropriate for the Commission Staff to update the test period for this case?

21 A. I believe that the Staff should, as it has in the past, look at subsequent months to confirm  
22 the appropriateness of the Company's adjustment to the September 30, 2012 test year  
23 data. This is the same approach used in the Company's prior rate cases (*See Case Nos.*

1 GR-90-120, GR-92-165, GR-94-220, GR-96-193, GR-98-374, GR-99-315, GR-2001-  
2 629, GR-2002-356, GR-2005-0284, GR-2007-0208, and GR-2010-0171).

3 Q. Please explain what information you believe Staff should review.

4 A. The Staff should look at the latest information available prior to filing its testimony in  
5 this proceeding. Such information would most likely be available following the closing  
6 of March 31, 2013 business, depending upon the procedural schedule established in this  
7 case. The Company's filed case includes the estimated effect of a March 31 update.

8 Q. Is the Company requesting a true-up in this case?

9 A. Yes. Laclede requests a true-up through a date no earlier than July 31, 2013. It is  
10 essential that the most recently available information be included in the calculation of  
11 rates. Additionally, there are several significant events that will occur between the  
12 proposed update period of March 31, 2013 and July 31, 2013. These include, but are not  
13 limited to, changes in labor rates paid under the Company's union labor contracts, a  
14 possible change in the annual assessment paid to the Commission, and, most importantly,  
15 the placement in service of the new Customer Care and Billing system as part of the  
16 EIMS project. However, the Company is willing to work with the parties concerning an  
17 alternative update method that would obviate the need for a complete true-up.

18 **ADJUSTMENTS TO UTILITY OPERATING INCOME**

19 Q. Please explain what is contained in Schedule 4.

20 A. This schedule shows the amounts recorded in the Company's books and records for the  
21 year ended September 30, 2012 for all the items of utility operating revenues and  
22 operating expenses as well as a final total for the Company's utility operating income for  
23 that period. The second column shows a summary of the normalization and annualization

1 adjustments made to the actual test year results to arrive at the third column, which is the  
2 pro forma statement of operating income for the year ended September 30, 2012.

3 Q. Please explain what is contained on Schedule 5.

4 A. The adjustments shown in the second column of Schedule 4 are listed and detailed on  
5 pages 1 through 5 of Schedule 5. Each of these adjustments is described by the  
6 sponsoring Company witnesses in their testimony.

7 Q. Please explain the adjustments you are sponsoring to utility operating income.

8 A. I am sponsoring several adjustments to the income statement. These adjustments appear  
9 on Schedule 5 and are discussed below.

#### 10 ***PROPERTY AND LIABILITY INSURANCE***

11 Q. Please describe your adjustment to property and liability insurance.

12 A Adjustment 6.h. adjusts property and liability insurance for the annualized effect of  
13 increased costs experienced in the test year. Many of the policies were renewed on April  
14 1, 2012 at an increased cost. The remainder of the policies were renewed with a  
15 relatively minor price increase on October 1, 2012. As the renewals were for a one-year  
16 term, the April 1, 2012 policies will have to be renegotiated before the end of the  
17 proposed update period in this proceeding, and the expense reflecting the new rates  
18 should be included in the operating expenses as updated.

#### 19 ***INJURIES AND DAMAGES***

20 Q. Please describe your adjustment to injuries and damages expense.

21 A Adjustment 6.i. adjusts injuries and damages expense to a three-year average of actual  
22 cash payments, which have demonstrated no discernable trend in the last several years.

1 Q. Is the Company proposing a tariff change relating to the limits of its liability?

2 A. The Company is proposing a tariff change that would establish liability parameters for  
3 the Company under certain circumstances, including instances where the Company enters  
4 a customer's premise to perform utility work.

5 Q. Won't this proposal decrease the Company's injuries and damages expense?

6 A. The Company believes that if the tariff is approved, such expenses should decrease over  
7 time. However, benefits from approval of the tariff will likely not be realized for a  
8 number of years due to the lag in time between when potentially actionable incidents  
9 occur and when lawsuits are actually filed and adjudicated.

10 ***WAGES AND SALARIES***

11 Q. Please explain the adjustment you are sponsoring related to the level of Laclede's wages  
12 and salaries.

13 A. Adjustment 8 on Schedule 5 is made to reflect known and measurable changes in the  
14 level of wages and salaries applicable to operation and maintenance expense.

15 Q. Please explain how the adjustment to Laclede Division contract wages is calculated.

16 A. The Company's current labor contract with its Laclede Division union employees  
17 includes, among other changes, annual increases in wage rates for physical and clerical  
18 workers effective August 1, 2012, and August 1, 2013. Laclede Division contract wages  
19 charged to operation and maintenance were normalized to include the current labor  
20 contract provisions effective August 1, 2012, in order to present the full twelve-month  
21 impact of changes in those provisions. In addition, this adjustment increases wage  
22 expense for the effect on operation and maintenance expenses of the change in labor

1 contract provisions which will occur on August 1, 2013. Further, the adjustment includes  
2 the pro-forma effect of normalized overtime hours based on a 4-year average.

3 Q. Please explain the adjustment to Missouri Natural Division contract wages.

4 Missouri Natural Division contract wages charged to operation and maintenance were  
5 normalized to give effect to the wage increase for field unit workers and clerical workers  
6 effective April 15, 2012, in accordance with the current labor agreement. In addition, this  
7 adjustment increases wage expense for the effect on operation and maintenance expense  
8 of an increase in labor rates on April 15, 2013, which will occur as a result of the labor  
9 contract.

10 Q. Please explain the adjustment to management salaries.

11 A. Management salaries were adjusted to reflect anticipated salary levels at July 31, 2013.

12 Q. Did you perform any other adjustments to wages and salaries?

13 A. Yes. The Operations and Maintenance percentage (“O&M”) was adjusted for the  
14 employees who will be shifting back to O&M from the newBLUE project that was  
15 addressed in the testimony of Company witness Ryan Hyman. Additionally, payroll  
16 reflects the institution of an all-employee incentive compensation program that has been  
17 addressed in the direct testimony of Company witness David SeEVERS.

18 Q. Have you made adjustments for fringe benefits as a result of the wage and salary  
19 adjustments discussed above?

20 A. Yes. The impact of the adjustments on costs which are directly related to wages and  
21 salaries has been included in the FICA tax adjustment sponsored by Company witness  
22 Christopher Reck and in the 401(k) adjustment discussed in the testimony of Company  
23 witness Gina Sparacino.



1           ***EQUITY COMPENSATION COSTS***

2    Q.     Please explain the adjustment you are sponsoring related to equity compensation costs.

3    A.     Adjustment 6.k removes from the test year costs related to equity compensation booked  
4           on behalf of Company employees. Although the expense reduces Laclede Gas earnings,  
5           it does not result in a cash outflow.

6           ***CREDIT CARD FEES***

7    Q.     Please explain the adjustment you are sponsoring related to the level of credit card fees.

8    A.     Laclede will be providing its customers the option to pay their bills through a credit card  
9           payment. Previously, this option was only available if customers paid through a pay  
10           station or other third-party vendor, to whom they paid an additional fee. The adjustment  
11           includes a representative level of estimated payments by Laclede to the vendor who is  
12           providing the credit card processing service.

13   Q.     Is the Company requesting an Accounting Authority Order (“AAO”) related to these  
14           fees?

15   A.     Yes. The program is just beginning, so there is no level of costs in the test year and the  
16           costs cannot be accurately predicted. As there is usually a “ramp-up” of program  
17           participation with new offerings such as this, it would be appropriate to set a benchmark  
18           level of cost recovery in rates and create a tracker to defer as a regulatory asset or  
19           liability, the difference of cost allowance included in rates for this item and the actual  
20           expenses incurred by the Company. Such deferred amount would be returned to, or  
21           recovered from, our customers as part of Laclede’s next general rate case.

22   Q.     Has the Commission authorized such a tracker in any other proceedings?

1 A. It is my understanding that the Commission approved a similar deferral in a recent KCPL  
2 rate case (ER-2006-0314).

3 ***GAIN ON DISPOSAL OF ASSETS***

4 Q. Please explain the adjustment you are sponsoring concerning asset disposal.

5 A. Adjustment 7.a removes non-recurring gains on the sale or disposal of assets. These  
6 gains are related to income on the sale of land previously used for utility service as well  
7 as a one-time gain on disposal of Company vehicles.

8 **ENVIRONMENTAL COST AAO**

9 Q. Is Laclede proposing to institute an Environmental Cost Accounting Authority Order in  
10 this proceeding?

11 A. Laclede is requesting approval of an Accounting Authority Order in this case to allow the  
12 deferral of costs related to the clean-up of former Manufactured Gas Plants. The costs  
13 may begin to be incurred in substantial amounts in the near future, and, although  
14 potentially significant, are not predictable in either timing or amount. When Laclede was  
15 incurring such costs in the past, it was granted an environmental AAO, which was  
16 eventually allowed to expire in Case No. GR-99-315. Since the Company is once again  
17 incurring such costs, it is seeking a similar AAO in this proceeding.

18 **TRUE-UP RECOVERY MECHANISM**

19 Q. Is Laclede proposing a true-up recovery mechanism in this proceeding?

20 A. While the Company has made no adjustment at this point in this case, Laclede is  
21 recommending that the Commission consider the inclusion of a rate base adjustment in  
22 the rates established in this proceeding that would be designed to compensate the

1 Company for any under-recovery (or customers for any over-recovery) that occurs  
2 between the last date financial figures are trued-up or updated in this case and the date the  
3 Commission's order becomes effective.

4 Q. How would the amount of the rate base adjustment be calculated?

5 A. The amount would be calculated by determining what greater or lesser amount the  
6 Company would have received had the revenue requirement determinations and resulting  
7 rates and charges approved by the Commission in its final Report and Order been applied  
8 to the stub period between when financial information was updated and when rates are  
9 scheduled to become effective.

10 Q. Over what period of time would this rate base amount be recovered or returned to  
11 customers?

12 A. I would recommend it be recovered or returned to customers over a three year period so  
13 that the rate base amount would not continue to build when a new rate case is filed.

14 Q. How would this mechanism affect customers?

15 A. Attached as Schedule GWB-1 is a simplified example of the customer effect of  
16 implementing such a mechanism. As shown, with a rate increase similar to the one  
17 Laclede received in its last rate proceeding, the effect on a residential family would be  
18 about \$.25/month. With that said, if the Commission finds that a rate increase is "just  
19 and reasonable" as of a certain date, based on a consideration of all relevant factors, then  
20 it is appropriate to apply the increase/decrease as of the measurement date, without regard  
21 to the period of time it takes for the Commission to hold evidentiary hearings, consider  
22 briefs or decide any contested issues. In recent cases and in a recent docket, the  
23 Commission has expressed an interest in rate stabilization mechanisms due, in part, to

1 utilities' concerns regarding regulatory lag and the customers' concerns about frequent  
2 rate cases. This proposal would help to reduce the regulatory lag on behalf of both the  
3 utilities and the customers, while still providing the Staff and other parties with the same  
4 amount of time they have today to audit the Company's rate filing. This proposal is also  
5 similar in concept to legislation that was passed by the Missouri General Assembly two  
6 sessions ago in which a temporary rate adjustment mechanism was authorized to ensure  
7 that parties who successfully appealed Commission orders would not be adversely  
8 affected by "judicial lag." Just as there is no good reason to deny parties the financial  
9 benefit of a judicial order because it takes a while to obtain appellate review, so too is  
10 there no good reason to deny parties the benefit of a Commission order because it takes  
11 time to litigate a rate case.

#### 12 **RATE OF RETURN**

13 Q. Have you prepared an exhibit showing the calculation of the rate of return the Company  
14 is seeking on its original cost rate base?

15 A. Yes. Schedule 7 demonstrates the calculation of Laclede's rate of return to be 8.374% at  
16 proposed rate levels based on an original cost rate base. This overall rate of return  
17 calculation is based on, among other things, a 10.5% return on common equity.

18 Q. What is the cost of common equity recommended by Company Witness Robert Hevert?

19 A. Mr. Hevert is recommending a return on equity range of 10.0% - 10.75%.

20 Q. On this exhibit, you have used capitalization ratios derived from Page 1 of Schedule 3.  
21 What do these ratios represent?

1 A. These capitalization ratios represent the ratios found in The Laclede Group's capital  
2 structure at September 30, 2012, reflecting the forward debt placements addressed earlier  
3 in this testimony.

4 Q. Does this complete your direct testimony?

5 A. Yes.

**GLEN W. BUCK**

**TRUE-UP RECOVERY MECHANISM**

**SCHEDULE GWB-D1**

Representative Rate Increase (RR)			35,000,000
Less: ISRS Currently In Effect			<u>11,900,000</u>
Net Rate Increase (NRR)			23,100,000
True-Up Period	Jul-13		
Operation of Law Date	Nov-13		
Months Delayed (M)		3	
Deferred Recovery (NRR x M)/12)			5,775,000
Recovery Period		3	
Amount to add/subtract to rate order			<u>1,925,000</u>
Net Rate Increase			<u><u>25,025,000</u></u>
Additional Cost per Customer Per Month			<u><u>\$ 0.25</u></u>

**SCHEDULE GWB-D1**

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

In the Matter of Laclede Gas Company's Filing of    )  
Revised Tariffs to Increase its Annual Revenues    )     Case No. GR-2013-0171  
For Natural Gas Service                                    )

A F F I D A V I T

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 720 Olive Street, St. Louis, Missouri 63101; and I am Manager-Financial Services of 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.

  
\_\_\_\_\_  
Glenn W. Buck

Subscribed and sworn to before me this 13<sup>th</sup> day of December, 2012.

  
Notary Public

KARENA. ZURLIENE Notary Public - Notary Seal STATE OF MISSOURI St. Louis City My Commission Expires: Feb. 18, 2016 Commission # 12382873
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