

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

<b>In the Matter of the filing of Laclede Gas</b>	<b>)</b>	
<b>Company's PGA factors to be reviewed in</b>	<b>)</b>	<b>Case No. GR-2013-0253</b>
<b>its 2011-2012 ACA filing.</b>	<b>)</b>	

**STAFF ACA RECOMMENDATION**

**COMES NOW** the Staff ("Staff") of the Missouri Public Service Commission ("Commission") in the above-captioned matter and, in response to the Commission's *Order Directing Filing* issued herein on November 20, 2012, files its ACA Recommendation in this case concerning Laclede Gas Company's 2011-2012 Actual Cost Adjustment ("ACA") filing as set forth in the attached Staff Recommendation Memorandum (Appendix A), and further states as follows:

1. Laclede Gas Company ("Laclede" or "Company" or "LGC") filed its ACA for the 2011-2012 period in this case on October 31, 2012. By its *Order Directing Filing* issued on November 20, 2012, the Commission ordered that Staff file its recommendation regarding the ACA filing no later than December 13, 2013.

2. Staff's recommendation is set forth in the attached Staff Recommendation Memorandum, which is being filed as Highly Confidential ("HC") in its entirety at this time. Staff is filing the recommendation as HC out of an abundance of caution since Staff does not know what parts of the attached memorandum would be considered as HC by Laclede and what would not. Therefore Staff would request that Laclede review the attached memorandum and inform Staff via email what portions of the attached Laclede considers to be HC; after receiving this information from Laclede, Staff will re-

file the memorandum in both a Public and HC version so that as much of the recommendation as can be filed openly will be so filed.

3. At this time, Staff has proposed no dollar adjustments to the 2011-2012 ACA account balances as filed by the Company, subject to certain reservations shown in the attached. However, as also reflected in the attached, Staff does have some comments / concerns / recommendations and requests that Laclede be ordered to respond thereto within forty-five (45) days.

**WHEREFORE**, Staff requests that the Commission (1) accept the attached Staff ACA Recommendation, (2) order Laclede to respond to the comments / concerns / recommendations set forth in the attached within forty-five (45) days, (3) keep this case open as set forth on the last page of the attached under VI. B. 1., and (4) make such further orders as the Commission may deem necessary.

Respectfully submitted,

**/s/ Jeffrey A. Keevil**

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### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 13th day of December 2013.

**/s/ Jeffrey A. Keevil**