Exhibit No.:	
Issue:	*Stipulation and Agreement in Case No. GM-2001-0342*
Witness:	*Anne M. Allee*
Sponsoring Party:	*MoPSC Staff*
Type of Exhibit:	*Rebuttal Testimony*
Case No.:	*GR-2011-0006*
Date Testimony Prepared:	*January 20, 2011*

MISSOURI PUBLIC SERVICE COMMISSION

UTILITY SERVICES DIVISION

REBUTTAL TESTIMONY

OF

ANNE M. ALLEE

LACLEDE GAS COMPANY

CASE NO. GC-2011-0006

Jefferson City, Missouri
January, 2011

REBUTTAL TESTIMONY

OF

ANNE M. ALLEE

LACLEDE GAS COMPANY

CASE NO. GC-2011-0006

Q. Please state your name and business address.

A. Anne M. Allee, P.O. Box 360, Jefferson City, Missouri 65102.

Q. By whom are you employed and in what capacity?

A. I am a Regulatory Auditor with the Missouri Public Service Commission (Commission).

Q. Are you the same Anne M. Allee who previously filed Direct Testimony in this case?

A. Yes, I am.

Q. What is the purpose of your Rebuttal Testimony?

A. The purpose of my testimony is to respond to the Direct Testimony of Laclede Gas Company's (Laclede or Company) witnesses, Michael T. Cline, Glenn W. Buck and Patricia A. Krieger, as it relates to Staff's complaint against Laclede Gas Company.

EXECUTIVE SUMMARY

Q. Please summarize the issue addressed in your Rebuttal Testimony.

A. In the Laclede Reorganization Case No. GM-2001-342, the Commission approved the stipulation and agreement of the parties and authorized Laclede to reorganize.

The Company's witnesses have filed testimony in this case asserting that Laclede has met its obligation under the stipulation and agreement (S&A) in Case No. GM-2001-342 (Michael T. Cline Direct, page 4, lines 9-11; Patricia A. Krieger Direct, page 9, line 12 to page 10, line 2). Staff disagrees and filed a complaint against Laclede stating that by arguing that the documents sought by Staff were not in its possession, custody or control, Laclede violated section IV.2 of the stipulation and agreement (Complaint, page 6, paragraph 19).

STIPULATION AND AGREEMENT

Q. Are you aware that Mr. Cline has testified that the Company has "[a]bsolutely complied with its obligation under the 2001 S&A to provide whatever information is reasonably necessary to verify compliance with these pricing requirements?" (Cline Direct, pg. 4, lines 6-9).

A. Yes, I am.

Q. And are you aware that Ms. Krieger has testified that she believes Laclede "has complied with the provisions of the 2001 S&A." (Krieger Direct, pg. 9, lines 11-12)?

A. Yes, I am.

Q. Do you agree with their testimony that Laclede has met its obligations under the 2001 S&A?

A. No, I do not.

Q. Why not?

A. It seems to me that Mr. Cline and Ms. Krieger interpret Laclede's obligations under the 2001 S&A very narrowly. Section IV paragraph 2 of the stipulation and agreement, entitled "Access to Information Conditions," states in part:

> Laclede Gas Company and The Laclede Group, Inc. shall also provide Staff and Public Counsel any other such information (including access to employees) relevant to the Commission's ratemaking, financing, safety, quality of service and other regulatory authority over Laclede Gas Company; provided that Laclede Gas Company and any affiliate or subsidiary of The Laclede Group, Inc. shall have the right to object to such production of records or personnel on any basis under applicable law and Commission rules, excluding any objection that such records and personnel of affiliates or subsidiaries: (a) are not within the possession or control of Laclede Gas Company; or (b) are either not relevant or are not subject to the Commission's jurisdiction and statutory authority by virtue of or as a result of the implementation of the Proposed Restructuring.

As a part of Staff's Actual Cost Adjustment (ACA) review, it must examine the affiliated transactions of Laclede Gas Company for prudence. The Laclede Energy Resources (LER) documents that Staff has requested and the Commission has ordered Laclede to produce are relevant to Laclede Gas Company's ACA Cases and the Commission's ratemaking and general regulatory authority over Laclede. By refusing to produce those documents on the grounds that they are LER's documents and, consequently, not in Laclede's possession or control, Laclede has done exactly what it promised it would not do in the 2001 S&A.

Q. Do you have any rebuttal of Mr. Buck's Direct Testimony?

A. No. I was unable to find anything relevant to Staff's complaint in Mr. Buck's testimony to rebut.

Q. Does this conclude your rebuttal testimony?

A. Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

The Staff of the Missouri Public Service Commission, Complainant, vs. Laclede Gas Company, Respondent	)))	Case No. GC-2011-0006

AFFIDAVIT OF ANNE M. ALLEE

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

Anne M. Allee, of lawful age, on her oath states: that she has participated in the preparation of the foregoing Rebuttal Testimony in question and answer form, consisting of 3 pages to be presented in the above case; that the answers in the foregoing Rebuttal Testimony were given by her; that she has knowledge of the matters set forth in such answers; and that such matters are true and correct to the best of her knowledge and belief.

Anne M. Allee

Subscribed and sworn to before me this 20th day of January, 2011.

Notary Public

CARLA K. SCHNIEDERS
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: August 25, 2012
Commission Number: 08533187