

FILED

DEC 3 2015

Missouri Public
Service Commission

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

In the Matter of Laclede Gas Company's Verified)
Application to Re-Establish and Extend the Financing)
Authority Previously Approved by the Commission)

File No. GF-2015-0181

STAFF LATE-FILED EXHIBIT 14

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and respectfully submits the attached affidavit as late-filed Exhibit 14, and in support thereof states as follows:

1. Near the end of the evidentiary hearing in this matter on November 18, 2015, Laclede Gas Company ("Laclede") submitted its Exhibit 3 which was an affidavit of Lynn D. Rawlings originally filed in this case on June 19, 2015, in response to an affidavit Staff filed on June 18, 2015.

2. Both of the affidavits referenced above concerned the temporary extension of Laclede's current financing authority based on Laclede's request to extend its current financing authority until the effective date of an order resolving this case.

3. At the time Laclede offered Exhibit 3, Staff counsel requested leave to late-file a copy of Staff's affidavit addressing the temporary extension to which Laclede's Exhibit 3 responded. The presiding regulatory law judge assigned Staff's late-filed affidavit Exhibit No. 14.

4. Attached hereto is a copy of Staff's affidavit originally filed herein on June 18, 2015, which was assigned Exhibit No. 14 by the regulatory law judge.

Staff's Exhibit No. 14
Date 11-18-15 Reporter TT
File No. GF-2015-0181

WHEREFORE, Staff respectfully requests that the Commission receive the attached affidavit into the evidentiary record of this case as Exhibit 14.

Respectfully submitted,

/s/ Jeffrey A. Keevil

Jeffrey A. Keevil

Missouri Bar No. 33825

Attorney for the Staff of the

Missouri Public Service Commission

P. O. Box 360

Jefferson City, MO 65102

(573) 526-4887 (Telephone)

(573) 751-9285 (Fax)

Email: jeff.keevil@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record this 24th day of November, 2015.

/s/ Jeffrey A. Keevil

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Laclede Gas Company's)	
Application for Authority to Issue and Sell)	Case No. GF-2015-0181
First Mortgage Bonds, Unsecured Debt)	
and Preferred Stock, and to Issue)	
Common Stock and Receive Capital)	
Contributions)	

AFFIDAVIT OF ROBERT E. SCHALLENBERG

State of Missouri)
) ss.
County of Cole)

AFFIDAVIT

COMES NOW Robert E. Schallenberg and on his oath declares:

I am experienced utility regulatory auditor. Over the past 33 years, I have filed and given testimony at the Kansas Corporation Commission and Federal Energy Regulatory Commission in addition to the Missouri Public Service Commission. I am a 1976 graduate of the University of Missouri at Kansas City with a Bachelor of Science degree and major emphasis in Accounting. I am a CPA. After joining the Commission in November 1976, I have participated in many regulatory cases and have been involved with many of the incentive or alternative regulatory plans that have been implemented here in Missouri as well as multiple cost of services issues. These endeavors span the electric, natural gas and telephone industries. As director of the Utility Services Department, I supervise the work of the Financial Analysis Unit.


I am addressing the question of what level of financing authority Laclede requires for a three to six month period. My position is that financing authority for this period should be no more than \$100 million.

I reach this conclusion by considering two factors. Nothing in this extension precludes Laclede from seeking specific approval of any actual financing the Company wishes to execute. These situations have occurred in the past and Staff has met timeframes required to complete each specific financing.

The parties disagree regarding the amount of general financing authority that should be authorized for Laclede for a three to six month period. In fact, no general financing authority is needed because any specific financing the Company needs can

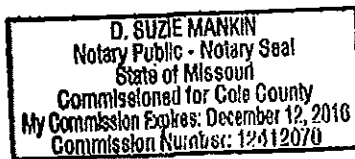
be approved as has been done many times in the past. The \$100 million cap I support was derived by considering dividing the \$370 million three year authority the Company seeks by six (representing six months). This calculation results in \$61.7 million. Then I rounded up to \$100 million in consideration for a contentious case running longer than six months.

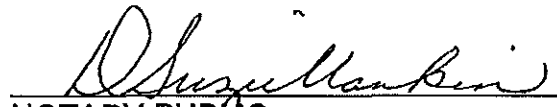
Further the Affiant sayeth not.


Robert E. Schallenberg

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 18th day of June, 2015.




NOTARY PUBLIC