

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

In the Matter of Laclede Gas Company,)
Missouri Gas Energy’s Purchased Gas)
Adjustment Tariff Filing) **Case No. GR-2014-0324**

RESPONSE TO ORDER DIRECTING FILING

COMES NOW the Staff of the Missouri Public Service Commission and for its Response to Order Directing Filing (“Response”), states as follows:

1. On April 25, 2017, in response to a Status Report filed earlier that day by Staff in which Staff recommended that the MGE school transportation program (“STP”) balancing/cash out issue should be addressed in MGE’s pending rate case (Case No. GR-2017-0216) rather than in this ACA case (Case No. GR-2014-0324), the Commission issued, by delegation of authority, an *Order Directing Filing* (“Order”) in which it stated that “the Commission is considering consolidating the two cases [Case Nos. GR-2017-0216 and GR-2014-0324].” The Order allowed parties the opportunity to respond no later than May 5, 2017; therefore, Staff is filing this Response.

2. Numerous entities which are not parties to this ACA case have filed for intervention in MGE’s pending rate case. Consolidating this ACA case with the rate case would unnecessarily complicate this ACA case and potentially create a cloud over what has already been resolved in this case. Staff continues to recommend that the STP balancing/cash out issue be addressed in MGE’s pending rate case, as stated in Staff’s Status Report filed on April 25, 2017; however, this does not require consolidating the two cases. Therefore, Staff does not recommend consolidating the two cases.

3. The Commission has already issued – on March 16, 2016 – an order establishing the ACA account balance(s) in this ACA case.

4. The two outstanding issues in this case are (1) compliance with the CAM and Standards of Conduct, which is being addressed in a currently on-going investigation case Staff requested be opened (Case No. GO-2017-0223), and (2) the STP issue which, even without consolidating cases, will be addressed in MGE's pending rate case (Case No. GR-2017-0216) as explained in Staff's Status Report filed April 25, 2017.

5. Therefore, since the ACA balance(s) has been established and the two outstanding issues are being addressed in other cases, this case can simply be closed (not dismissed) rather than consolidated with the rate case. Accordingly, Staff recommends this case be closed.

6. Counsel for Missouri Gas Energy ("MGE"), the Missouri School Boards' Association ("MSBA"), and the Office of the Public Counsel ("OPC") have indicated their agreement with this Response.

WHEREFORE, Staff submits this Response to the *Order Directing Filing* issued April 25, 2017, and requests the Commission issue an order closing this ACA case, Case No. GR-2014-0324.

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 counsel of record this 4th day of May, 2017.

/s/ Jeffrey A. Keevil