

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

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

**THE OFFICE OF THE PUBLIC COUNSEL'S STATEMENT
IN SUPPORT OF STAFF'S RECOMMENDATION**

COMES NOW the Office of the Public Counsel (Public Counsel) and for its Statement in Support of Staff's Recommendation states as follows:

1. On April 15, 2015, Laclede Gas Company (Laclede) submitted an application with the Missouri Public Service Commission (Commission) to re-establish and extend its financing authority pursuant to Section 393.200, RSMo., Commission Rule 4 CSR 240-3.220 and the Commission's Order in GF-2009-0450.
2. On June 8, 2015, the Staff of the Missouri Public Service Commission (Staff) filed its Recommendation.
3. In its Recommendation, Staff recommended the Commission issue an order rejecting Laclede's requested financing authority amount of \$550 million and instead approving financing authority for Laclede in an amount and under the conditions as described in Staff's Highly Confidential Memorandum, which was attached as Appendix A.
4. Public Counsel now states that it has reviewed Laclede's Application as well as Staff's Recommendation and attached Memorandum. Public Counsel shares Staff's concern that while all of the purposes Laclede lists in its Application reflect purposes for which the Commission

may authorize financing as listed in Section 393.200(1) RSMo., it may not be practical and/or reasonable to conclude that Laclede has the need to issue financings for the purposes listed.

5. Public Counsel agrees with Staff that experience has demonstrated that the amount of authority the Commission granted Laclede in Case No. GF-2009-0450 and extended in Case No. GF-2013-0085, was not, in fact, reasonably required for the purposes specified in the orders in those cases.

6. Based on this, Public Counsel shares Staff's belief that the amount of financing authority Laclede requests in this case is not reasonably required for the purposes set forth in its Application. As a result, Public Counsel supports Staff's Recommendation as just and reasonable in this case.

WHEREFORE, Public Counsel respectfully submits its statement of support of Staff's Recommendation.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

/s/ Christina L. Baker

By: _____

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the parties of record this 16th day of June 2015:

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