

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

In the Matter of Laclede Gas Company's
Application to Establish Depreciation)
Rates for Enterprise Computer Software)
System.)

Case No. GO-2012-0363

STAFF'S MOTION TO ESTABLISH PROCEDURAL SCHEDULE

COMES NOW the Staff of the Missouri Public Service Commission ("Commission") and moves the Commission to Order an Early Pre-Hearing Conference in accord with 4 CSR 240-2.090, to establish a procedural schedule for this case, including, but not limited to dates for an evidentiary hearing. In support thereof, Staff states:

1. On May 4, 2012, Laclede filed its Application to establish depreciation rates for its new Information Management System (self-described as "newBLUE").
2. Laclede describes this new system in glowing terms claiming it will be "transformative" for the Company and "how it operates." (Laclede App. at para. 5.)
3. Laclede further claims the Company will have "additional tools to improve customer care." (Laclede App. at para. 6.)
4. Staff has had preliminary informal discussions with the Company, but has not gathered sufficient information to make a Recommendation to the Commission regarding Laclede's assertions in its Application.
5. There are no facts in the record to support Laclede's assertions or to demonstrate that the Commission's granting Laclede's request for a Commission Order would be in the public interest.

6. Staff requests the Commission set an early Pre-Hearing Conference to establish a procedural schedule for this case, including dates for completion of discovery, filing of testimony and for an evidentiary hearing in accord with 4 CSR 240-2.090.

7. The Office of the Public Counsel has indicated it joins in this request.

WHEREFORE, Staff respectfully requests the Commission issue its Order Setting a Pre-Hearing Conference to Establish a Procedural Schedule, including dates for an evidentiary hearing.

Respectfully submitted,

/s/ Lera L. Shemwell

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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 14th day of May, 2012.

/s/ Lera L. Shemwell