

the GSIP report without contracting with an outside contractor to significantly expand the report to replicate those reporting capabilities.

6. Laclede's GSIP Tariff Sheet No. 28-b.3, Section D.g., specifies the information that the GSIP monitoring reports are *required* to contain. The additional information Staff recommended is not required to be provided in the GSIP monitoring reports. However, Staff expects the Company will ensure its web-based application has the ability to produce the specific information required by Tariff Sheet No. 28-b.3, Section D.g., to be provided to Staff and Public Counsel in the GSIP monitoring reports, which is not clear from the Company's supplemental response.

7. In both its *Recommendation Regarding Laclede Gas Company's 2014-2015 Actual Cost Adjustment Filing* filed herein on December 16, 2016, and its *Reply to Laclede Gas Company's Response to Staff's Recommendation and Memorandum* filed herein on February 16, 2017, Staff recommended the Commission hold this case open pending further investigation into Laclede's compliance with the gas supply documentation requirements of Laclede's CAM and Standards of Conduct, and that the Commission open an investigatory docket for this purpose. On February 22, 2017, the Commission issued an *Order Opening an Investigation* for this purpose, which has been docketed as File No. GO-2017-0223. That order also ordered Staff to file a progress report in File No. GO-2017-0223 regarding its investigation no later than August 22, 2017.

8. As discussed above, Staff does not necessarily agree with all statements Laclede made in its *Supplemental Response to Staff's Recommendation Regarding Two Specific Issues*. Furthermore, Staff is currently investigating Laclede's compliance

with the gas supply documentation requirements of Laclede's CAM and Standards of Conduct in more detail in File No. GO-2017-0223, which was opened pursuant to Staff's recommendations in this case.

WHEREFORE, Staff submits this reply to Laclede's supplemental response as ordered on May 31, 2017, and respectfully requests that this case remain open¹ pending resolution of Staff's investigation in File No. GO-2017-0223.

Respectfully submitted,

/s/ Jeffrey A. Keevil

Jeffrey A. Keevil
Missouri Bar No. 33825
P. O. Box 360
Jefferson City, MO 65102
(573) 526-4887 (Telephone)
(573) 751-9285 (Fax)
Email: jeff.keevil@psc.mo.gov

Attorney for the Staff of the
Missouri Public Service Commission

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 15th day of June, 2017.

/s/ Jeffrey A. Keevil

¹ The ACA account balances should not be finalized at this time.