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

In the Matter of the Application of Laclede Gas	)	
Company to Change its Infrastructure System	)	File No. GO-2016-0333
Replacement Surcharge in its Laclede Gas	)	Tariff No. YG-2017-0047
Service Territory	)	
-		
In the Matter of the Application of Laclede Gas	)	
Company to Change its Infrastructure System	)	File No. GO-2016-0332
Replacement Surcharge in its Missouri Gas	)	Tariff No. YG-2017-0048
Energy Service Territory	)	

## <u>RESPONSE OF LACLEDE GAS AND MGE</u> <u>TO THE STAFF'S RECOMMENDATIONS</u>

COMES NOW Laclede Gas Company ("Laclede"), on behalf of its eastern Missouri operating unit ("Laclede Gas") and its western Missouri operating unit, Missouri Gas Energy ("MGE"), and files this response to the Recommendations filed by Staff on November 29, 2016 in the above referenced dockets. In support thereof, Laclede states as follows:

1. Laclede appreciates the thorough and timely work done by Staff in auditing these ISRS cases. Laclede agrees with and supports the Staff's Recommendations, including the rates recommended by Staff in Appendix B, in both cases. Attached hereto are specimen tariff sheets reflecting those rates.

2. Laclede filed its applications on September 30, 2016 and, consistent with the prior practice that has been approved by the Commission in the past two ISRS cases, the applications included detailed information on ISRS investments through August 2016, with estimates for September and October. Laclede replaced the estimates with actual expenditures on October 19 (Laclede Gas) and October 20 (MGE) for the September work, and on November 10 for both companies' October work, and submitted such information to both Staff and the Office of the Public Counsel. Laclede agrees with the dates in the Staff's Recommendations when further information was provided.

3. Finally, Laclede also agrees that the requests to waive the 60 day notice period were mooted by the fact that more than 60 days' notice was provided in both cases.

4. Laclede understands that the filing by OPC earlier today has raised issues that will require a hearing. It is disappointing that OPC waited until Day 70 of a 120 day process to raise issues that could have been raised much earlier. Laclede agrees with OPC that the Commission should direct the parties to file a proposed procedural schedule at the earliest practicable time.

WHEREFORE, for the foregoing reasons, Laclede respectfully requests that the Commission issue its Order approving the Company's ISRS applications with the changes recommended by Staff, including the rates contained in the specimen tariff sheets attached hereto; or in the alternative, direct the parties to file a proposed procedural schedule.

Respectfully submitted,

## <u>/s/ Rick Zucker\_</u>

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ATTORNEY FOR LACLEDE GAS COMPANY AND MGE

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## **CERTIFICATE OF SERVICE**

Marcia Spangler hereby certifies that the foregoing response has been duly served upon the Staff and the Office of the Public Counsel by hand delivery, email, fax, or United States mail, postage prepaid, on this 9th day of December, 2016.

/s/ Marcia Spangler