BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Missouri Gas)	Case No. GO-2014-0179
Energy, a division of Laclede Gas Company, for)	1 2 2 2 2 2 2 2 2 2 2 2 7 7 6 7 7 6
Approval to Change its Infrastructure System	
Replacement Surcharge.	

MGE'S RESPONSE TO THE COMMISSION'S ORDER

COMES NOW Missouri Gas Energy, a division of Laclede Gas Company, ("MGE") and in response to the Order Regarding Public Counsel's Motion to Reject Application ("Order"), states the following to the Missouri Public Service Commission ("Commission"):

- 1. On January 22, 2014, the Commission issued its Order which a) denied Public Counsel's Motion to Reject Application and b) ordered MGE to supplement the Infrastructure System Replacement Surcharge ("ISRS") application and petition ("ISRS Application") which it submitted on December 6th, 2013.
- 2. In response to that Order, MGE requests to supplement its ISRS Application with the attached <u>Supplemental Appendix B</u>. With this supplemental information, MGE has broken down ISRS costs by individual work order while identifying which project categories apply and the specific requirements being satisfied by the infrastructure replacements for each project. Further, MGE has cited the statute, commission order, rule or regulation requiring the project.
- 3. Specifically, <u>Supplemental Appendix B</u> has a legend at the bottom which matches a code letter to the relevant legal requirement. It also has a new Column P which matches the work order description in Column N to the corresponding legal requirement. There are also references to Commission Order GO-2002-50, which speaks to the replacement of cast iron, bare steel, service lines, the use of encapsulation, and leak priority.
- 4. MGE sent the attached <u>Supplemental Appendix B</u> to Staff counsel and Public Counsel this morning, who have not yet had the opportunity to review it in detail. If either party

has concerns over the format of the revised appendix, MGE will work with both parties to come to a mutually-agreeable format consistent with the Commission Order within the normal ten-day reply deadline. Should the parties have an issue that requires Commission review, MGE respectfully suggests that they can file a pleading at that time.

WHEREFORE, MGE requests to supplement its ISRS Filing with the attached Supplemental Appendix B, which is submitted in response to the Commission's Order.

Respectfully Submitted,

Todd J. Jacobs

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Certificate of Service

I hereby certify that copies of the above and foregoing document were sent by electronic mail on this 3rd day of February, 2014 to counsel of record.

Todd J. Jacobs