

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

In the Matter of the Verified Application and)	
Petition of Laclede Gas Company to Change its)	<u>File No. GO-2012-0356</u>
Infrastructure System Replacement Surcharge)	

**STAFF RESPONSE
TO ORDER DIRECTING FILING**

COMES NOW the Staff of the Commission and Responds to the Commission's Order Directing filing. In Response Staff states:

1. On November 9, 2011, Laclede Gas Company (Laclede) filed a Verified Application with the Commission, requesting authorization to establish an Infrastructure System Replacement Surcharge (ISRS) for numerous gas utility plant projects in Missouri as permitted by Missouri Statute Sections 393.1009393.1012 and 393.1015, (RSMo 2000 as currently supplemented).

2. Staff continues to object to Laclede's process of filing its Application with a tariff effective date other than the traditional 30-day tariff effective date under the guise that this unilateral process assures compliance with a provision in Case No. GR-2010-0171. Section 393.140(11).

3. The Commission approved Stipulation and Agreement in GR-2010-0171 does not contain any provision for Laclede or any other party to "assure compliance" with the ISRS section of the Stipulation. The correct method of assuring compliance with provisions of a Stipulation and Agreement is filing a complaint.

4. In response to Laclede filing its compliance tariff Staff states that the Commission's Energy Unit - Tariffs/Rate Design Staff (Staff) has reviewed the tariff sheet, filed by Laclede on June 27, 2012, and is of the opinion that this sheet is in compliance with the Commission's Order.

WHEREFORE Staff states it continues to object to the process Laclede has adopted for filing of ISRS Applications in which it unilaterally sets an effective date other than the traditional 30-day date for its proposed tariffs, and Staff further states it is of the opinion Laclede's June 27 tariff sheet complies with the Commission's June 27 Order.

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 2nd day of July 2012.

/s/ Lera L. Shemwell_____