

Exhibit No.:
Issue: ISRS Updates
Witness: Glenn W. Buck
Type of Exhibit: Rebuttal Testimony
Sponsoring Party: Laclede Gas Company; MGE
Case No.: GO-2015-0341; GO-2015-0343
Date Prepared: October 9, 2015

**LACLEDE GAS COMPANY
MISSOURI GAS ENERGY**

**GO-2015-0341
GO-2015-0343**

REBUTTAL TESTIMONY

OF

GLENN W. BUCK

October 2015

1 **REBUTTAL TESTIMONY OF GLENN W. BUCK**

2 Q. **PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

A. My name is Glenn W. Buck, and my business address is 700 Market St., St. Louis, Missouri, 63101.

3 Q. **ARE YOU THE SAME GLENN W. BUCK WHO SUBMITTED DIRECT**
4 **TESTIMONY IN THESE PROCEEDINGS ON AUGUST 28, 2015.**

5 A. I am.

6 **PURPOSE OF TESTIMONY**

7 Q. **WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

8 A. The purpose of my testimony is to respond to the direct testimony of Office of Public
9 Counsel (“OPC”) Witness Jacqueline Moore filed on October 2, 2015.

10 Q. **DID MS. MOORE FILE ANY REBUTTAL TO YOUR DIRECT TESTIMONY ON**
11 **THAT DATE?**

12 A. No. According to her testimony, which was captioned “Direct Testimony”, the purpose
13 was “to provide the Commission with facts relevant to Laclede Gas Company’s
14 (“Laclede” or “Company”) and Missouri Gas Energy’s (“MGE”) petitions to change their
15 respective Infrastructure System Replacement Surcharges (“ISRS”).” (Moore Direct,
16 Page 3, lines 9 – 12) According to the procedural schedule adopted by the Commission,
17 on October 2, “Staff and Public Counsel will file rebuttal testimony to Laclede’s direct,
18 and may file direct testimony on other issues.”¹ As no rebuttal testimony was filed on
19 that day, the direct testimonies that both Laclede witness Seamands and I filed are
20 uncontroverted.

¹ See Order Suspending Tariff, Scheduling Evidentiary Hearing and Setting Procedural Schedule (EFIS document # 7) which adopted Laclede’s Proposed Procedural Schedule (EFIS document # 5).

1 **Q. ON PAGE 3, LINES 15 – 19 OF HER DIRECT TESTIMONY, MS. MOORE**
2 **ATTEMPTS TO PORTRAY A “BUDGET” COST AS FOLLOWS: “A**
3 **“BUDGET” COST IS DESCRIBED BY LACLEDE AND MGE AS A PRO-**
4 **FORMA COST THAT IS LATER FOLLOWED BY RECONCILIATION.” HOW**
5 **DO YOU COMMENT?**

6 A. Ms. Moore implied that she found this in our “Applications”, however this is not the case.
7 There is no reconciliation involved -- rather, the Company files with the pro-forma (i.e.
8 estimated) costs of projects and then updates these amounts with actual expenditures
9 shortly thereafter in the process. As I addressed in my direct testimony, this is a process
10 that has been in place for many years without controversy.

11 **Q. MS. MOORE INCLUDED A QUANIFICATION OF THE COST OF VARIOUS**
12 **REGULATOR STATIONS INCLUDED IN THE LACLEDE FILING IN HER**
13 **TESTIMONY? (DIRECT, PAGE 7, LINE 9 – 12) DO YOU AGREE WITH**
14 **THOSE QUANTIFICATIONS?**

15 A. No. It appears that Ms. Moore may have taken those totals from Laclede’s prior ISRS
16 filing. The actual cost included in the filing for the Osceola and Virginia station is
17 \$500,677.46 (work order 003304). The cost of the Euclid and Hooke station (work order
18 003305) is \$646,408.40.

19 **Q. DO YOU HAVE ANY OTHER COMMENTS REGARDING MS. MOORE’S**
20 **TESTIMONY?**

21 A. I just want to clarify for the Commission’s benefit that all of the dollar figures quoted in
22 Ms. Moore’s testimony are the actual amounts expended by Laclede, not the revenue
23 requirement impact which, because of capitalization of the expenditures, is much lower.

1 In the 6-month period reflected in this ISRS filing, the Laclede Gas Operating Unit
2 actually spent \$43.8 million on ISRS-eligible property, yet is seeking an ISRS increase of
3 \$4.5 million.

4 Q. **DOES THIS COMPLETE YOUR REBUTTAL TESTIMONY?**

5 A. Yes.

