## BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

In the Matter of Laclede Gas Company's	)	
Application for a Variance from the	)	Case No. GE-2014-0
Commission's January 12, 2011 Order	)	
Regarding the Timing of CAM Annual Reports	)	

#### **VERIFIED APPLICATION FOR VARIANCE**

COMES NOW Laclede Gas Company ("Laclede" or "Company") and, pursuant to 4 CSR 240-2.060(4), respectfully requests the Missouri Public Service Commission ("Commission") grant Laclede a variance so that the Company may file its CAM Annual Report for the Laclede Division four business days later than it would otherwise be due. In support of this Application, Laclede states as follows:

#### **INTRODUCTION**

- 1. Laclede is a public utility incorporated under the laws of the State of Missouri, with its principal office located at 720 Olive Street, St. Louis, Missouri 63101.
- A Certificate of Good Standing evidencing Laclede's standing to do
  business in Missouri was submitted in Case No. GM-2013-0254 and is incorporated by
  reference herein for all purposes. The information in such Certificate is current and
  correct.
- 3. Through its Laclede Division, Laclede is engaged in the business of distributing and transporting natural gas to customers in the City of St. Louis and the Counties of St. Louis, St. Charles, Crawford, Jefferson, Franklin, Iron, St. Genevieve, St. Francois, Madison, and Butler in Eastern Missouri, as a gas corporation subject to the jurisdiction of the Commission.
  - 4. Communications in regard to this Application should be addressed to:

Rick Zucker Associate General Counsel Laclede Gas Company 720 Olive Street, 14<sup>th</sup> Floor St. Louis, MO 63101 (314) 342-0533

- 5. Other than cases that have been docketed at the Commission, Laclede has no pending actions or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates.
- 6. Laclede is current on its annual report and assessment fee obligations to the Commission, and no such report or assessment fee is overdue.

#### **GOOD CAUSE FOR THE REQUESTED VARIANCE**

- 7. By order dated January 12, 2011 in Case No. GE-2011-0171 (the "January 12 Order"), the Commission granted the Company a variance from Commission Rules 4 CSR 240-40.015(4)(B) and (C), and 40.016(5)(B) and (C), which permitted Laclede to maintain affiliate transaction information on a fiscal year basis (i.e., 12 months ended September 30), rather than on a calendar year basis, and to provide such information by December 15 of the succeeding fiscal year rather than on March 15 of the succeeding calendar year. As stated in the January 12 Order, this process is both more cost-effective for Laclede and less error prone than trying to assemble information from two different financial periods. The January 12 Order was incorporated into Laclede's CAM, which was approved by the Commission by order dated August 14, 2013 in Case No. GC-2011-0098 *et. al.* (the "August 14 Order").
- 8. Laclede is currently involved in a general rate case for its MGE Division, along with other matters involved in the integration of Laclede and MGE. The press of such business along with holiday schedules makes it difficult for the Company to ensure

that it will meet the December 15 deadline, which this year falls on a Sunday. Laclede is therefore requesting a variance from the January 12 Order, the CAM and the August 14 Order to permit the Company to file its CAM Annual Report by December 20, 2013, or four business days after the current due date.

9. Good cause exists for the variance because it will help Laclede better ensure an accurate filing while meeting Commission-ordered deadlines at a very busy time for the Company. In addition, Laclede believes that the four-day extension will not cause any harm to or undue burden on any party. Laclede personnel have communicated with members of both Staff and Public Counsel and are authorized to represent that neither of them object to the four day extension requested in this case. Finally, Laclede believes that no other public utility will be affected by the variance requested herein.

#### **REQUEST FOR RELIEF**

WHEREFORE, for the foregoing reasons, Laclede Gas Company respectfully requests that the Commission issue its Order granting a variance from the January 12 Order, the CAM, the August 14 Order, and from Commission Rules 4 CSR 240-40.015(4)(B) and (C) and 40.016(5)(B) and (C), to permit the Company to file its CAM Annual Report for Fiscal 2013 by December 20, 2013.

Respectfully Submitted,

#### /s/ Rick Zucker

Rick Zucker, #49211 Assistant General Counsel-Regulatory Laclede Gas Company 720 Olive Street, 14<sup>th</sup> Floor St. Louis, MO 63101

Telephone: (314) 342-0532 Facsimile: (314) 342-9577

E-mail: rick.zucker@thelacledegroup.com

### **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing Verified Application for Variance was served on the General Counsel of the Staff of the Missouri Public Service Commission and the Office of Public Counsel, on this 9th day of December, 2013, by hand-delivery, fax, email or United States mail, postage prepaid.

/s/ Marcia Spangler

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State of Missouri	) ) SS.		
City of St. Louis	) 33.		
	VERIFICATION		
being first duly swor for Variance filed on	uck, Director, Regulatory and Finance of Laclede Gas Company, a, verify that I am familiar with the foregoing Verified Application behalf of Laclede; and that the matters set forth therein are true and my knowledge, information and belief.		
	Dan W Buch		
Glenn W. Buck			
Subscribed and sworn to before me this 6th day of December, 2013.			
	Katherine & Reaiden		
My Commission exp	res: <u>May 10, 2015</u>		
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