

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

In the Matter of the Application of Laclede)	
Gas Company to Transfer an Asset to Spire)	Case No. GM-2017-0018
Pipeline, Inc.)	

**LACLEDE GAS COMPANY'S
RENEWED MOTION TO STAY PROCEEDINGS**

COMES NOW Laclede Gas Company (“Laclede” or “Company”) and renews its motion to stay all proceedings in this case, and in support thereof states as follows:

1. On October 31, 2016, Laclede Gas Company filed an application requesting authority to sell and transfer to Spire STL Pipeline LLC (“STL Pipeline”), an affiliate of Laclede, approximately eight miles of the easternmost nine miles of existing 20 inch steel pipeline currently owned and operated by Laclede in North St. Louis County (the “880 Line Segment”).¹ The sale would have permitted the 880 Line Segment to be incorporated into a new interstate pipeline.

2. On February 16, 2017, Laclede filed a motion to stay these proceedings (the “Motion”) informing the Commission and the parties that STL Pipeline has been exploring other potential routes for constructing the pipeline based on an ongoing evaluation of costs, operational considerations and other factors. As a result of those efforts, STL Pipeline was strongly considering an alternative to the 880 Line Segment. Laclede noted in the Motion that it would not be an efficient use of the Commission’s or the parties’ resources to continue to work on this case, and requested that the case be stayed pending further determination of the pipeline’s route.

3. There was no opposition to the Motion, except that OPC conditioned its non-opposition on Laclede’s response to a discovery request, to which the Commission agreed. By order dated February 24, 2017, the Commission denied the Motion pending resolution of OPC’s

¹ The length of the 880 Line Segment to be purchased was later rounded down to seven miles.

motion to compel Laclede to respond to OPC's discovery request. On March 8, OPC withdrew its Motion to Compel.

4. On March 15, STL Pipeline delivered a letter to the FERC providing a Preliminary Notification of Preferred Route Change. The letter informed the FERC that STL Pipeline had decided that one of its alternative routes had now become its preferred route. A copy of STL Pipeline's March 15 letter to the FERC is attached hereto as Exhibit 1.

5. As a result, the pipeline route that included the 880 Line Segment is no longer the preferred route; however, it still remains an alternative to the preferred route.

6. This further development provides even more reason to stay all proceedings and activities in this case. Laclede therefore renews its Motion for stay. If the Stay is granted, Laclede intends to file a motion to dismiss this proceeding, or a motion to lift the stay, as soon as it becomes aware that a final determination has been made on the pipeline's route. If such action has not been taken by May 1, 2017, Laclede Gas further commits to file a status report on that date, advising the Commission and the parties of any relevant developments that have occurred in the intervening time.

WHEREFORE, Laclede respectfully requests that the Commission stay all activity in this case pending a future filing seeking to either resume the case or dismiss it.

Respectfully Submitted,

/s/ Rick Zucker

Rick Zucker, #49211

Associate General Counsel

Laclede Gas Company

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to the parties of record in this case on this 29th day of March, 2017.

/s/ Marcia Spangler



Spire STL Pipeline LLC.
700 Market Street
St. Louis, Missouri 63101

March 15, 2017

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington DC 20426

Re: Docket No. CP17-40-000
Spire STL Pipeline, LLC
Preliminary Notification of Preferred Route Change

Dear Ms. Bose:

On January 26, 2017, Spire STL Pipeline, LLC (“Spire”) filed its Application for Certificates of Public Convenience and Necessity (“Certificate Application”), seeking authority to construct, own, and operate the Spire STL Pipeline Project (“Project”), an approximately 66-mile new interstate natural gas pipeline that will bring natural gas supplies from the Rockies Express Pipeline to eastern Missouri, including the St. Louis metropolitan area and surrounding counties. As proposed, the Project would comprise 59 miles of greenfield construction (referred to as the 24-inch pipeline) and 7 miles of existing pipeline (referred to as Line 880) that would be acquired from Spire’s affiliate, Laclede Gas Company (“Laclede”).

The purpose of this letter is to notify the Commission that Spire has determined to adopt the six-mile greenfield pipeline alternative described in Resource Report 10, Alternatives, of Spire’s Certificate Application (referred to as Minor Alternative 5) as its preferred route. This six-mile segment, to be known as the North County Extension, will extend the new 24-inch pipeline. Spire’s decision is the result of its continued detailed construction and engineering review, study of the proposed route and various alternatives, and stakeholder outreach. As Spire will explain in greater detail in its forthcoming amendment to the Certificate Application, the North County Extension is superior to Line 880 in multiple respects, including elimination of potential supply disruption risk for Laclede during construction, greater scheduling certainty, elimination of uncertainty regarding Line 880 upgrade costs, lower long-term integrity management costs, and fewer construction-related impacts on densely-populated local communities.

Spire confirms that the North County Extension route is the same route that is the subject of the Commission Staff’s Supplemental Notice of Intent to Prepare an Environmental Assessment for the Proposed Spire STL Pipeline Project and Request for Comments on Environmental Issues (“Supplemental NOI”) issued in this proceeding on March 3, 2017.

Spire is preparing an amendment to its Certificate Application that will include all necessary information about this route change and its effects, if any, on all aspects of the Spire STL Pipeline Project. Spire’s amendment application will also respond to comments received in response to the Supplemental NOI. Spire expects to file that amendment in mid to late April, 2017.

Please contact the undersigned if you have any questions regarding this matter.

Sincerely,

Scott Jaskowiak

Mr. Scott Jaskowiak
Vice President
Spire STL Pipeline LLC
314-516-8588
scott.jaskowiak@spireenergy.com

cc: All Parties on Service List
Mr. Terry Turpin, Director, Office of Energy Projects, FERC
Mr. John Wood, Office of Energy Projects, FERC
Ms. Pamela Boudreau, Office of Energy Projects, FERC
Mr. J. Rich McGuire, Office of Energy Projects, FERC
Mr. Howard Wheeler, Office of Energy Projects, FERC
Ms. S. Xiah Kragie, Office of Energy Projects, FERC
Mr. Kevin Bowman, Office of Energy Projects, FERC
Ms. Jennifer Ward, EDGE Engineering and Science

CERTIFICATE OF SERVICE

I hereby certify that, on this, the 15th day of March, 2017, I have caused a copy of the foregoing document to be served, by electronic mail, upon all parties listed on the service list compiled by the Office of the Secretary, Federal Energy Regulatory Commission, for the above-referenced proceeding.

/s/ Russell Kooistra

Russell Kooistra