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)	Case No. GR-2015-0026
Infrastructure System Replacement Surcharge in)	Tariff No.YG-2015-0027
its Laclede Gas Service Territory)	

LACLEDE GAS COMPANY'S MOTION FOR EXPEDITED TREATMENT

COMES NOW Laclede Gas Company ("Laclede Gas" or "Company") and files this Motion for Expedited Treatment, and in support thereof, states as follows:

- 1. Staff filed its Amended Recommendation in this case on September 30, 2014. On October 6, Laclede, Staff and Public Counsel filed a Unanimous Stipulation and Agreement ("Agreement") in which they agreed to the rates recommended by Staff, adjusted for the removal of two work orders as more fully explained in the Agreement. Laclede requests that the Commission issue an Order: (a) rejecting the tariff filed by the Company on July 25, 2014, and (b) directing the Company to file a revised tariff sheet in the form contained in the specimen tariff sheet attached to the Agreement. Laclede further requests that the Commission direct in its Order that such tariff include an effective date of October 18, 2014.
- 2. There is good cause for Laclede Gas' request that the tariff sheet changing its ISRS be approved for service rendered on and after October 18, 2014. First, such approval will honor and comply with the terms in paragraph 15 of the Stipulation and Agreement approved by the Commission in Case No. GR-2013-0171 (the "Stipulation"), wherein the parties agreed to work to implement the Company's ISRS filings as soon as reasonably possible. Since all items included in the requested ISRS are currently in service and being used to render utility service, any delay beyond the requested effective date would simply unnecessarily prolong the date when such costs can begin to be recovered. Second, the expedited treatment requested would permit

the ISRS tariff to become effective on the same date requested by Laclede Gas for its MGE ISRS, thereby maintaining continuity in the processing of the two operating units' ISRS filings. Third, there is no dispute regarding the amounts to be recovered through this ISRS filing, as the parties have entered into the Agreement which expressly provides that Laclede would file this motion seeking an October 18 effective date.

- 3. Laclede Gas states that there will be no negative effect on Laclede's customers or the general public if the Commission issues such an order and that this pleading was filed as soon as it could have been following the filing of the Agreement.
 - 4. Neither Staff nor Public Counsel opposes this request for expedited treatment.

WHEREFORE, for the foregoing reasons, Laclede Gas respectfully requests that the Commission accept this response and, consistent with the Agreement, issue its Order rejecting the July 25, 2014 tariff and directing the Company to file a revised tariff sheet effective October 18, 2014 with the same rates contained in the specimen tariff attached to the Agreement.

Respectfully submitted,

/s/ Rick E. Zucker

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ATTORNEY FOR LACLEDE GAS COMPANY

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing pleading was served on all of the parties to this case on this 7th day of October, 2014 by hand-delivery, fax, electronic mail or by United States mail, postage prepaid.