## 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.	)	

## **MOTION TO STAY PROCEEDINGS**

**COMES NOW** Laclede Gas Company ("Laclede" or "Company") and files this 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 8 miles of the easternmost 9 miles of existing 20 inch steel pipeline currently owned and operated by Laclede in North St. Louis County (the "880 Line Segment"). The sale would have permitted the 880 Line Segment to be incorporated into a new interstate pipeline.
- 2. Since the Application was filed, STL Pipeline has continued to explore 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, Laclede has been advised that STL Pipeline is strongly considering an alternative route for the pipeline, and may in the near future decide to cease its pursuit of the 880 Line Segment. Given this development, Laclede believes that it would not be an efficient use of the Commission's or the parties' resources to continue work on the matters at issue in this proceeding. Laclede accordingly requests that the Commission issue a stay of this proceeding, including relieving Staff of its obligation to make a filing by March 10, and staying all other activities in the case such as discovery. Laclede would note that a similar stay of proceedings was recently issued by the Commission at the request of the Office of the

Public Counsel in Case No. GC-2016-0297, so the Commission has clearly recognized the appropriateness of granting such relief under the proper circumstances.

3. 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 March 16, 2017, Laclede Gas further commits to filing a status report by March 16, 2017 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 700 Market Street, 6<sup>th</sup> Floor St. Louis, MO 63101

Telephone: (314) 342-0533 Facsimile: (314) 421-1979

E-mail: rick.zucker@spireeneergy.com

## **Certificate of Service**

I hereby certify that copies of the foregoing have been emailed to Staff and Public Counsel on this 16th day of February, 2017.

/s/\_Marcia Spangler\_\_\_\_