

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

In the Matter of the Application of Laclede)
Gas Company to Change its Infrastructure) **Case No. GO-2015-0341**
System Replacement Surcharge in its)
Laclede Gas Service Territory)

In The Matter of the Application of Laclede)
Gas Company to Change its Infrastructure) **Case No. GO-2015-0343**
System Replacement Surcharge in its)
Missouri Gas Energy Service Territory)

MOTION FOR EXPEDITED TREATMENT

COMES NOW Laclede Gas Company, doing business as Laclede Gas in its eastern Missouri service territory (“Laclede”), and doing business as Missouri Gas Energy in its western Missouri service territory (“MGE”) and submits this Motion for Expedited Treatment (this “Motion”), stating as follows:

1. In this Motion, Laclede and MGE request that the Commission issue its orders in the referenced cases on November 12, as discussed by the Commission in its agenda meetings, to be effective ten (10) days thereafter, on November 22. While this request calls for what could be considered a normal 10 day effective date rather than a particularly expedited time frame, out of an abundance of caution Laclede and MGE are making this filing.

2. To the extent expedited treatment is being requested by Laclede and MGE, there is certainly good cause therefor. First, pursuant to paragraph 15 of the Stipulation and Agreement approved by the Commission in Laclede’s rate case, Case No. GR-2013-0171 (the “Rate Case Stipulation”), Laclede has substantially reduced its ISRS request in

exchange for Staff and OPC's agreement to work to implement Laclede's ISRS filings as soon as reasonably possible. In this case alone, the reduction amounts to approximately \$600,000 per year. Given such consideration, a November 22 implementation date is certainly fair and warranted.

3. Second, since the Laclede case has been heard and briefed, the parties have no further duties other than to potentially seek rehearing on any matter decided by the Commission. In a case where there are only two issues, and especially where Staff and OPC have committed to expedited implementation, Laclede asserts that having six full business days to seek rehearing is more than ample.

4. Good cause exists for expediting treatment in the MGE case also. First, having both the Laclede and MGE ISRS become effective at the same time allows Laclede to more efficiently place the new rates into effect. Second, because the only issue in the MGE ISRS case is identical to one of the two issues in the Laclede case, no additional time should be needed to seek rehearing in one case over the other.

5. Finally, because there are only two issues in total, there are very limited choices in the tariffed rates needed to comply with any order that might be issued by the Commission. Based on the two agenda discussions held by the Commission over the past two weeks, Laclede has already been working with Staff to generate tariffed rates. Such rates have been shared with the other parties. Laclede and MGE represent that they intend to file revised tariffs within one business day after issuance of the Commission's orders in these cases.

6. Since this request is based upon the Rate Case Stipulation, which was signed by all of the parties to these ISRS cases and approved by the Commission, harm

will be avoided, and the intent of these parties and the Commission will be served, by a Commission order and corresponding tariffs becoming effective on November 22, 2015. Laclede and MGE state that there will be no negative effect on their customers or the general public if the Commission issues such an order.

7. This pleading was filed as soon as it could have been following evaluation of Commission agenda discussions and development of tariffed rates.

WHEREFORE, for the foregoing reasons, Laclede Gas Company respectfully requests that the Commission issue its Order approving ISRS tariff rates for Laclede and MGE, effective November 22, 2015.

Respectfully submitted,

/s/ Rick Zucker

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Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing pleading was served on the parties to this case on this 9th day of November, 2015, by hand-delivery, e-mail, fax, or by United States mail, postage prepaid.

/s/ Marcia Spangler