

restore or maintain natural gas space heating service in a safe manner by providing payment assistance for that purpose of up to \$450 for each eligible customer. Such reallocation would occur either through a remittance by DNR from Low-Income Weatherization Funding already paid by Laclede or through a deduction of future payments to DNR.²

3. It is expressly understood by the undersigned that customers participating in the program established by the Revised Tariff Sheet would continue to be eligible to participate in the Low-Income Weatherization (and, in fact, would be informed of and encouraged to apply for Weatherization), that such customers would continue to be subject to the rights and obligations afforded by the Commission's Cold Weather Rule, and that any expenditures made by Laclede for the reallocated funds would be treated for recovery purposes in a manner identical to funds expended on the Low Income Program.

4. With this Motion, Laclede requests that the Commission permit the Revised Tariff Sheet to go into effect on less than 30 days' notice. Specifically, Laclede requests that the Commission approve the Revised Tariff Sheet effective for service on and after December 31, 2010.

5. Consistent with 4 CSR 240-2.080(16), Laclede submits that there is good cause for granting its request. The December 31, 2010 effective date will allow this

²Remittance of funds already paid to DNR requires amendment of the Cooperation and Funding Agreement which must be approved by the EI ERA Board, a quasi-governmental body that serves as the financing arm for DNR. Because the EI ERA Board will not meet until mid January at the earliest, Laclede has agreed to make funding available in advance of that date so that the Program can be implemented as soon as reasonably possible. If funds are remitted, future payments to DNR will be reconciled to ensure that DNR receives full payment of Low-Income Weatherization funds, minus the amount spent on the Emergency Repair Program this Winter pursuant to the Tariff.

effort to maintain or restore service to eligible utility customers to be implemented in a timely manner as the winter heating season progresses.

6. Laclede filed the Revised Tariff Sheet as soon as possible after the stakeholders reached an agreement on the specifics of this initiative.

7. Laclede, OPC and Staff have worked constructively with DNR to develop this proposed modification and all of these parties are in agreement that the Revised Tariff Sheet should be approved. The other parties to the stipulations and agreements in this case have also been served with the Revised Tariff Sheet and to date no objection has been expressed. Because no other party has expressed any objection to the relief requested herein, no waiver of the Stipulation and Agreement that dealt with the Low-Income Weatherization Program in this proceeding may be necessary. Nevertheless, Laclede, Staff and OPC request any waiver that the Commission may believe is appropriate.

WHEREFORE, for the foregoing reasons, Laclede Gas Company, on behalf of itself, Staff and OPC, respectfully requests that the Commission issue its Order approving the Revised Tariff Sheet for service rendered on and after December 31, 2010 and granting any necessary waiver.

LACLEDE GAS COMPANY

/s/ Michael C. Pendergast

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Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing Motion was served on all of the parties to Case No. GR-2010-0171 on this 21st day of December 2010 by hand-delivery, email or United States mail, postage prepaid.

/s/ Gerry Lynch
Gerry Lynch