# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Missouri Gas Energy's	)	
Filing of Revised Tariffs to Increase its Annual	)	Case No. GR-2014-0007
Revenues for Natural Gas Service	)	

#### MOTION TO DEFER SUBMISSION OF REPORT

COME NOW Missouri Gas Energy, a regulatory operating unit of Laclede Gas Company ("MGE" or "Company"), the Staff of the Missouri Public Service Commission ("Staff") the Office of the Public Counsel ("OPC") the Midwest Gas Users Association ("MGUA"), and the Division of Energy of the Missouri Economic Development Department ("Division of Energy") (collectively "the Parties") and in support of this Motion to Defer Submission of Report, state as follows:

- 1. In paragraph 3 of the Stipulation and Agreement resolving this case, the Parties agreed to work collaboratively to gather customer usage, billing, financial, demographic and other data necessary to fully explore and present various rate design structures in MGE's next rate case proceeding, including information that would permit an assessment of the potential impact of various rate design structures on the Company and customers with different usage and demographic characteristics. The parties also agreed to prepare and submit a report within 18 months of the completion of Case No. GR-2014-0007 that would summarize the results of their efforts.
- 2. Although the Parties have met and made progress in gathering the information identified in the Stipulation and Agreement, the press of other business, including participation by some parties in a number of major rate case proceedings since the Stipulation and Agreement was filed, has delayed their efforts to complete the work.

3. In addition to the above, since both this project and the decoupling workshop

established by the Commission in Case No. AW- 2015-0282 pertain to rate design issues, the

Parties also believe it may be helpful to review and assess the Staff's report in the decoupling

workshop, due on November 2, along with any other developments in that docket, before

concluding their work in this case. The Parties intend to meet again in the very near future to

discuss the Staff report in the decoupling workshop, the data gathered to date, and any further

data gathering that may be necessary or advisable for this project.

In light of these considerations, the Parties respectfully request that the

Commission issue an order deferring the date for submitting the Report under paragraph 3 of the

Stipulation and Agreement in Case No. GR-2014-0007 until May 3, 2016. The Parties commit

to filing the Report sooner if completed. In the event any circumstances arise that would

necessitate any further change in this date, the Parties would notify the Commission at least 30

days in advance and provide a full explanation of any requested change.

WHEREFORE, for the foregoing reasons, the undersigned Parties respectfully request

that the Commission issue an order deferring the date for submitting the Report under paragraph

3 of the Stipulation and Agreement in Case No. GR-2014-2007 until May 3, 2016.

Respectfully submitted,

LACLEDE GAS COMPANY,

doing business as Missouri Gas Energy

/s/ Rick Zucker

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