

**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-2015-0_____**
System Replacement Surcharge in its)
Laclede Gas Service Territory)

**LACLEDE’S NOTICE OF INTENDED CASE FILING
AND APPLICATION FOR WAIVER OF 60 DAY NOTICE PERIOD**

COMES NOW Laclede Gas Company (“Laclede”) and, pursuant to Commission Rule 4 CSR 240-4.020(2) and 2.060(4), respectfully submits its Notice of Intended Case Filing (“Notice”) and requests a waiver from the application of 4 CSR 240-4.020(2) to its next application to change its Infrastructure System Replacement Surcharge (“ISRS”). In support of its Notice and Application for Waiver, Laclede states as follows:

1. Laclede is a public utility incorporated under the laws of the State of Missouri, with its principal office located at 700 Market Street, St. Louis, Missouri 63101. Contact information for communications with Laclede, through the Company’s legal counsel, including Laclede’s electronic mail address, fax number and telephone number, are set forth on the signature page of this Notice.

2. A Certificate of Good Standing evidencing Laclede’s standing to do business in Missouri was attached to the Company’s application in Case No. GF-2013-0085, and is incorporated herein by this reference. The information on such Certificate is currently applicable and correct.

3. Laclede is primarily engaged in the business of distributing and transporting natural gas to customers in both the eastern and western portions of the State of Missouri. Under the name Laclede Gas Company, Laclede serves customers in the

City of St. Louis and ten counties in Eastern Missouri. Under the name Missouri Gas Energy (“MGE”), Laclede serves customers in the City of Kansas City and thirty counties in western Missouri. Laclede is a gas corporation subject to the jurisdiction of the Missouri Public Service Commission (the “Commission”).

4. Other than cases that have been docketed at the Commission, Laclede has no pending actions or final unsatisfied judgments or decisions against it over the past three years from any state or federal agency or court which involve customer service or rates.

5. Laclede is current on its annual report and assessment fee obligations to the Commission, and no such report or assessment fee is overdue.

NOTICE OF INTENDED CASE FILING

6. Commission Rule 4 CSR 240-4.020(2) provides, in part, as follows:

Any regulated entity that intends to file a case likely to be a contested case shall file a notice with the secretary of the commission a minimum of sixty (60) days prior to filing such case. Such notice shall detail the type of case and issues likely to be before the commission.

7. Laclede intends to file its next ISRS application shortly, and believes that it will include issues that have been disputed in the past and, absent an agreement resolving such issues, will likely make it a contested case. The issues likely to be before the Commission involve matters that have already been identified by the parties in recent Laclede ISRS cases and deferred to its next ISRS case. These matters include ISRS eligibility of telemetry equipment installed in regulator stations to provide important information from those stations to gas control personnel; the ISRS eligibility of certain regulator stations in the City of St. Louis that were installed to replace old regulator stations that Laclede asserts were worn out or deteriorated; and the legality of a well-

established practice implemented by Laclede and the Staff to update both ISRS investments and depreciation during the term of the case.

REQUEST FOR WAIVER

8. Commission Rule 4 CSR 240-4.020(2)(B) states that any party may request a waiver of this section for good cause. Laclede requests the Commission waive the requirement in Section 4.020(2) that this notice be filed 60 days before filing its application in this case.

9. Laclede believes that good cause exists to waive the 60 day notice period. The 60 day period in the ex parte rules serves as a notice and identification to the Commission and other parties of an anticipated contested case, triggering disclosure requirements for extra-record communications. Such 60 day notice is not necessary in this case for two reasons. First, ISRS filings are common cases that are routinely filed by gas and water companies. The subject matter of ISRS cases is always the same, that is, the recovery of costs for ISRS eligible investments, and the filings themselves by the utilities are predictably similar. Except for the intervention of rate cases, Laclede itself has regularly filed ISRS applications twice per year for more than 10 years, and in general tends to file in January and July. As a result, these cases are already well-anticipated by the parties and the Commission, and a 60 day notice requirement would serve no purpose, because it would not afford meaningful information that is not already well known.

10. Second, the Commission and the parties are already well aware of the issues likely to be before the Commission in this case, as described above, because these issues have arisen over the past year in Laclede's two previous ISRS cases. Thus, the

parties have not only anticipated them, but should be aware of the potential that they will be litigated. As a result, a 60 day notice should not be required.

11. No public utility other than Laclede will be affected by this particular waiver.

WHEREFORE, for the foregoing reasons, Laclede respectfully requests that the Commission and its Secretary accept this Notice regarding Laclede's upcoming ISRS filing, and waive the 60 day notice period in Section 4.020(2).

Respectfully submitted,

/s/ Rick Zucker

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing pleading has been duly served upon the General Counsel of the Staff and on the Office of the Public Counsel by hand delivery, email, fax, or United States mail, postage prepaid, on this 19th day of June, 2015.

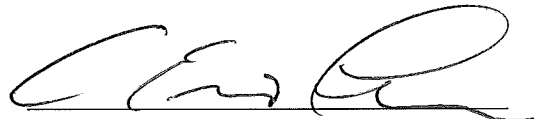
/s/ Marcia Spangler

Marcia Spangler

VERIFICATION

STATE OF MISSOURI)
) SS.
CITY OF ST. LOUIS)

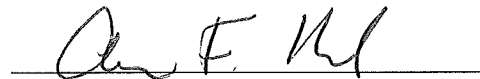
C. Eric Lobser, being duly sworn, on his oath states that he is Vice-President of Rates and Regulatory Affairs of Laclede Gas Company, the applicant in the foregoing Application; that he has read said Application, and that the matters and things set forth therein are true and correct to the best of his knowledge, information and belief.


C. Eric Lobser

Subscribed and sworn to before me a Notary Public in the City of St. Louis, State of Missouri, this 19th day of June, 2015.

My Commission expires: 11/15/17.

[seal]


Notary Public, State of Missouri

