

**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)
Missouri Gas Energy Service Territory)

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

COMES NOW Laclede Gas Company, doing business as Missouri Gas Energy (“MGE”) 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, MGE states as follows:

1. MGE is an operating unit of Laclede Gas Company, which is duly incorporated under the laws of the State of Missouri and conducts business in its MGE service territory under the fictitious name of Missouri Gas Energy.

2. Laclede's principal office is located at 700 Market Street, St. Louis, Missouri 63101. MGE’s principal office is located at 3420 Broadway, Kansas City, Missouri 64111. A Certificate of Good Standing evidencing Laclede's standing to do business in Missouri was submitted in Case No. GF-2013-0085 and is incorporated herein by reference for all purposes. The information in such Certificate is current and correct.

3. Other than cases that have been docketed at the Commission, neither MGE nor Laclede Gas Company has a pending action or final unsatisfied judgment against it from any state or federal agency or court within the past three (3) years that involve

customer service or rates. Neither Laclede nor MGE have annual report or assessment fees that are overdue.

4. MGE provides natural gas service to approximately 500,000 customers in the western Missouri counties of Andrew, Barry, Barton, Bates, Buchanan, Carroll, Cass, Cedar, Christian, Clay, Clinton, Dade, Dekalb, Greene, Henry, Howard, Jackson, Jasper, Johnson, Lafayette, Lawrence, McDonald, Moniteau, Pettis, Platte, Ray, Saline, Stone, and Vernon.

5. MGE is subject to the jurisdiction of the Missouri Public Service Commission as provided by law.

6. Communications in regard to this Application should be addressed to the undersigned counsel and to:

Michael R. Noack
Director, Pricing and Regulatory Affairs
Missouri Gas Energy
3420 Broadway
Kansas City, Missouri 64111
816-360-5560
Fax: 816-360-5536
E-mail: michael.noack@thelacledegroup.com

NOTICE OF INTENDED CASE FILING

7. 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.

8. MGE intends to file its next ISRS application shortly. In the 11 years that MGE has been making these filings, the parties have, for the most part, either had no substantive issues, or worked out any issues that have arisen. Nevertheless, based on

issues that arose in connection with its last ISRS case, MGE believes that its next ISRS application may result in a contested case because of potential issues relating to the inclusion of budgeted ISRS amounts and/or whether certain costs are eligible for recovery through the ISRS mechanism.

9. Although it does not appear that this ISRS case is the type of case intended to be covered by Commission Rule 4.020(2), MGE is nevertheless filing this Notice out of an abundance of caution.

REQUEST FOR WAIVER

10. Commission Rule 4 CSR 240-4.020(2)(B) states that any party may request a waiver of this section for good cause. MGE 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.

11. MGE 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. MGE avers that a 60 day notice is not necessary in ISRS cases. 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, MGE has regularly filed ISRS applications roughly 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.

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

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

Respectfully submitted,

/s/ Rick Zucker

Rick Zucker, Mo. Bar #49211
Associate General Counsel
Laclede Gas Company, d/b/a MGE
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St. Louis, MO 63101
Telephone: (314) 342-0532
Fax: (314) 421-1979
Email: rick.zucker@thelacledegroup.com

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.

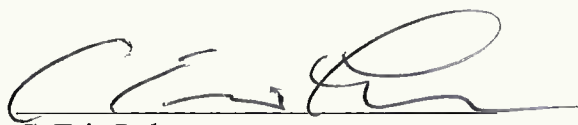
/s/ Marcia Spangler

Marcia Spangler

VERIFICATION

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

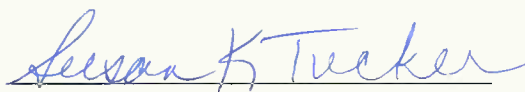
C. Eric Lobser, being duly sworn, on his oath states that he is Vice-President of Rates and Regulatory Affairs of Laclede Gas Company, which does business in Western Missouri as Missouri Gas Energy, the applicant in the foregoing Application; that he has read said Application, and that the matters and 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: 4/29/19

[seal]


Notary Public, State of Missouri

SUSAN K. TUCKER Notary Public - Notary Seal STATE OF MISSOURI St. Louis County My Commission Expires: April 29, 2019 Commission #15635108
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