



Laclede Gas Company  
720 Olive Street, Room 1516  
St. Louis, MO 63101  
(314) 342-0533

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

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

#### **GOOD CAUSE FOR THE REQUESTED VARIANCE**

7. By order dated January 12, 2011 in Case No. GE-2011-0171 (the “January 12 Order”), the Commission granted the Company a variance from Commission Rules 4 CSR 240-40.015(4)(B) and (C), and 40.016(5)(B) and (C), which permitted Laclede to maintain affiliate transaction information on a fiscal year basis (i.e., 12 months ended September 30), rather than on a calendar year basis, and to provide such information by December 15 of the succeeding fiscal year rather than on March 15 of the succeeding calendar year. As stated in the January 12 Order, this process is both more cost-effective for Laclede and less error prone than trying to assemble information from two different financial periods.

8. As indicated in its filing in GR-2013-0171, Laclede is currently preparing to file a general rate case. The preparation of the rate case along with the press of other business makes it difficult for the Company to ensure that it will meet the December 15 deadline, which this year falls on a Saturday. Laclede is therefore requesting a variance

from the January 12 Order to permit the Company to file its CAM Annual Report by December 21, 2012, or 6 days after the current due date.

9. Good cause exists for the variance because it will help Laclede meet Commission-ordered deadlines at a very busy time for the Company. In addition, Laclede believes that the six-day extension will not cause any harm to or undue burden on any party. Laclede personnel have spoken to members of both Staff and Public Counsel and are authorized to represent that neither of them object to the six day extension requested in this case. Finally, Laclede believes that no other public utility will be affected by the variance requested herein.

#### **REQUEST FOR RELIEF**

WHEREFORE, for the foregoing reasons, Laclede Gas Company respectfully requests that the Commission issue its Order granting a variance from the January 12 Order, and from Commission Rules 4 CSR 240-40.015(4)(B) and (C) and 40.016(5)(B) and (C), to permit the Company to file its CAM Annual Report for Fiscal 2012 by December 21, 2012.

Respectfully Submitted,

**/s/ Rick Zucker**

Michael C. Pendergast, #31763  
Vice President & Associate General Counsel  
Rick Zucker, #49211  
Assistant General Counsel-Regulatory

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**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing Verified Application for Variance was served on the General Counsel of the Staff of the Missouri Public Service Commission and the Office of Public Counsel, on this 29th day of November, 2012 by hand-delivery, fax, email or United States mail, postage prepaid.

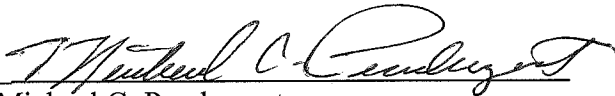
**/s/ Marcia Spangler**

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


State of Missouri     )  
                                  ) SS.  
City of St. Louis     )

**VERIFICATION**

I, Michael C. Pendergast, Vice-President and Associate General Counsel of Laclede Gas Company, being first duly sworn, verify that I am familiar with the foregoing Verified Application for Variance filed on behalf of Laclede; and that the matters set forth therein are true and correct to the best of my knowledge, information and belief.

  
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Michael C. Pendergast

Subscribed and sworn to before me this 29th day of November, 2012.

  
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My Commission expires:

October 5, 2013

