BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

In the Matter of Laclede Gas Company's)	
Application for a Variance from the)	Case No. GE-2015-0
Commission's January 12, 2011 Order)	
Regarding the Timing of CAM Annual Reports)	

APPLICATION FOR VARIANCE

COMES NOW Laclede Gas Company ("Laclede" or "Company") and, pursuant to 4 CSR 240-2.060(4), respectfully requests the Missouri Public Service Commission ("Commission") grant Laclede a variance so that the Company may file its CAM and CAM Annual Report for the Laclede Division four business days later than it would otherwise be due. In support of this Application, Laclede states as follows:

INTRODUCTION

- 1. Laclede is a public utility incorporated under the laws of the State of Missouri, with its principal office located at 720 Olive Street, St. Louis, Missouri 63101.
- 2. A Certificate of Good Standing evidencing Laclede's standing to do business in Missouri was submitted in Case No. GM-2013-0254 and is incorporated by reference herein for all purposes. The information in such Certificate is current and correct.
- 3. Through its Laclede Division, Laclede is engaged in the business of distributing and transporting natural gas to customers in the City of St. Louis and the Counties of St. Louis, St. Charles, Crawford, Jefferson, Franklin, Iron, St. Genevieve, St. Francois, Madison, and Butler in Eastern Missouri, as a gas corporation subject to the jurisdiction of the Commission.
 - 4. Communications in regard to this Application should be addressed to:

Rick Zucker Associate General Counsel Laclede Gas Company 720 Olive Street, 14th Floor 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. The January 12 Order was incorporated into Laclede's CAM, which was approved by the Commission by order dated August 14, 2013 in Case No. GC-2011-0098 *et. al.* (the "August 14 Order").
- 8. Due to a health related issue and surgery for a key employee who prepares the report, the Company requests a variance from the January 12 Order, the CAM and the

August 14 Order to permit the Company to make its annual CAM filing by December 19, 2014, or four business days after the current due date.

9. Good cause exists for the variance because it will help Laclede better ensure an accurate filing as our employee recovers from surgery. In addition, Laclede believes that the four-day extension will not cause any harm to or undue burden on any party. Laclede personnel have communicated with Staff and are authorized to represent that Staff does not object to the four 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, the CAM, the August 14 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 make its annual CAM filing for Fiscal 2014 by December 19, 2014.

Respectfully Submitted,

/s/ Rick Zucker

Rick Zucker, #49211 Assistant General Counsel-Regulatory Laclede Gas Company 720 Olive Street, 14th Floor St. Louis, MO 63101

Telephone: (314) 342-0532 Facsimile: (314) 342-9577

E-mail: rick.zucker@thelacledegroup.com

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing 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 12th day of December, 2014, by hand-delivery, fax, email or United States mail, postage prepaid.

/s/	Rick	Zucker	

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State of Missouri

City of St. Louis)	•
	<u>VERIFICATION</u>
duly sworn, verify that I and behalf of Laclede, that I are	ociate General Counsel of Laclede Gas Company, being first n authorized to verify this Application for Variance filed on n familiar with the foregoing pleading; and that the matters set orrect to the best of my knowledge, information and belief.
	<u>/s/ Rick Zucker</u> Rick Zucker