

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

In the Matter of Laclede Gas Company's     )  
Application for a Variance from the         )  
Provisions of Commission Rules Regarding )  
The Timing of CAM Annual Reports         )  
Case No. GE-2011-0171

**REPLY TO STAFF RESPONSE**

COMES NOW Laclede Gas Company ("Laclede" or "Company") and files this Reply to the Response filed by the Staff on January 4, 2011, stating as follows:

1. Laclede does not object to Staff's late filing of its Response and agrees that no prejudice resulted from a delay of one day in Staff's filing.

2. Laclede confirms that the Staff recommended that the Company request the variance that Laclede has applied for in this case, even though the practical effect of the procedure followed by the Company has been to provide Staff and Public Counsel with a large majority of its CAM-related information sooner than would have otherwise been required by the Commission's affiliate transactions rules. Nevertheless, Laclede agreed as part of the settlement of Case No. GR-2010-0171 to seek such a variance and Laclede has honored that commitment.

3. Staff has also honored its commitment in the Partial Stipulation and Agreement in Case No. GR-2010-0171 by supporting Laclede's request for variance in this case. Laclede appreciates the Staff's support. No other party has filed a response.

4. In its application, Laclede has demonstrated that, in accordance with Commission Rule 2.060(4), good cause exists for the Commission to grant a timing variance to Rules 40.015(4) and 40.016(5).

WHEREFORE, for the foregoing reasons, Laclede Gas Company respectfully requests that the Commission issue its order granting a variance from Commission Rules 4 CSR 240-40.015(4)(B) and (C) and 40.016(5)(B) and (C).

Respectfully Submitted,

**/s/ Rick Zucker**

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### **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing pleading was served on the General Counsel of the Staff of the Missouri Public Service Commission and the Office of Public Counsel, on this 7th day of January, 2011 by hand-delivery, fax, email or United States mail, postage prepaid.

**/s/ Gerry Lynch**