

FILED

JAN 14 1994

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

In the matter of Laclede Gas  
Company for authority to file  
tariffs to increase rates for  
gas service in Missouri.

)  
)  
) Case No. GR-94-220  
)

APPLICATION FOR VARIANCE

Comes now Laclede Gas Company by and through its counsel, and for its Application for Variance ("Application") pursuant to Section (7) of 4 CSR 240-40.040 from certain uniform system of accounts filing requirements for gas utilities, respectfully states as follows:

1. The exact legal name of the applicant is Laclede Gas Company ("Applicant" or "Laclede"), and its principal place of business is located at 720 Olive Street, St. Louis, Missouri 63101.

2. Laclede is a corporation organized under the laws of the State of Missouri and is a natural gas distribution company subject to the Commission's jurisdiction. As such, it is engaged in the sale and transportation of natural gas at retail to customers in the City of St. Louis and the Missouri Counties of St. Louis, St. Charles, Jefferson, Ste. Genevieve, St. Francois, Madison, Iron, Butler and Franklin.

3. All correspondence, communications, notices, orders and decisions of the Commission with respect to this matter should be sent to:

Robert J. Carroll  
Vice President-Finance and  
Chief Financial Officer  
Laclede Gas Company  
720 Olive Street, Room 1319  
St. Louis, Missouri 63101  
(314) 342-0596

Michael C. Pendergast  
Assistant General Counsel  
Laclede Gas Company  
720 Olive Street, Room 1530  
St. Louis, Missouri 63101  
(314) 342-0503

4. The recently amended version of Commission Rule 4 CSR 240-40.040 (the "Rule") became effective on October 10, 1993. Section (6) (B) 2 of that rule states that a utility shall submit, at the same time that it submits tariffs proposing a general rate increase, "its depreciation study, data base and property unit catalog" to the manager of the Commission's energy department and the Office of the Public Counsel. The due date for submitting the property unit catalog, however, is extended until July 1, 1996, by reason of subsection (2) (B) of the Rule.

5. Contemporaneously with the filing of this Application, Laclede has submitted tariffs to the Commission proposing a general increase in its rates for natural gas service. By this Application, Laclede seeks a variance on the timing of the submission of the depreciation study ("Study") and data base ("Data") that would otherwise be due with such tariff filing, for the reasons set forth below. Laclede seeks a variance from said Section (6) (B) 2, to extend the required submission date of the Study and Data to March 11, 1994.

6. Laclede personnel are currently working on the Study. Despite these efforts, however, Laclede anticipates that it will not be able to complete the Study until March 11, 1994. Laclede, therefore, intends to submit the Study and the corresponding Data to the manager of the Commission's energy department and the Office of the Public Counsel on or before March 11, 1994.


7. If the Commission grants this variance request, the Study and Data will be provided more than nine months in advance of the January 1, 1995 date on which the Rule would have required Laclede to submit such information in the absence of a general rate case filing. (See 4 CSR 240-40.040 (6) (B) 1 A.) Moreover, since the Study and the Data will be submitted less than sixty days after the initiation of this general rate proceeding, Laclede does not believe that the extension requested herein will deprive Staff or any other party of the time necessary to evaluate fully such information and prepare any relevant testimony in accordance with the expected procedural schedule in the rate case. This is particularly true in view of the fact that Laclede has already provided Staff with certain depreciation-related data pursuant to the terms of the Stipulation and Agreement approved in the Company's last general rate case proceeding, Case No. GR-92-165.

8. Laclede does not seek a hearing on this application. It believes that none is necessary and that it has presented sufficient grounds herein for the Commission to

determine that good cause exists for granting the requested variance.

WHEREFORE, for the reasons set forth above, Laclede respectfully requests an order of the Commission granting Laclede a variance from the above-mentioned requirements of Section (6) (B) 2 of 4 CSR 240-40.040 to allow Laclede to file its Study and Data on or before March 11, 1994.

Respectfully submitted,

  
Michael C. Pendergast  
Assistant General Counsel  
Laclede Gas Company  
720 Olive Street, Room 1530  
St. Louis, Missouri 63101  
(314) 342-0530

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

Robert J. Carroll, being first duly sworn, on his oath and in his capacity as Vice President-Finance and Chief Financial Officer for Laclede Gas Company, states that he: (1) is authorized to execute on behalf of Laclede Gas Company this Application for Variance and (2) has knowledge of the matters stated in such Application and that said matters are true to the best of his knowledge, information and belief.

Robert J. Carroll  
Robert J. Carroll

Subscribed and sworn to before me this 13<sup>th</sup> day of January, 1994.

Adelle M. Follmer  
Notary Public

Adelle M. Follmer  
Notary Public, State of Missouri  
Commissioned in Franklin County

My commission expires:

June 11, 1996

CERTIFICATE OF SERVICE

Michael C. Pendergast, Assistant General Counsel for Laclede Gas Company, hereby certifies that the foregoing Application for Variance in Case No. GR-94-\_\_ has been duly served upon the Office of the Public Counsel by placing a copy thereof in the United States mail, postage prepaid, on this 14<sup>th</sup> day of January, 1994

Michael C. Pendergast  
Michael C. Pendergast