BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Missouri Gas Energy's (Laclede) PGA filing

) File No. GR-2015-0203

VERIFIED APPLICATION FOR VARIANCE AND MOTION FOR EXPEDITED TREATMENT

COMES NOW Missouri Gas Energy ("MGE"), an operating unit of Laclede Gas Company ("Laclede"), and, pursuant to Commission Rules 4 CSR 240-2.060(4) and 4 CSR 240-2.080(14), submits this Application for Variance and Motion for Expedited Treatment (this "Motion") for approval by the Commission. In support of its Application and Motion, 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. Laclede's principal office is located at 700 Market Street, St. Louis, Missouri 63101. MGE's principal office is located at 7500 E. 35th Terrace, Kansas City, Mo. 64129. 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 by reference herein for all purposes. The information in such Certificate is current and correct.

2. In its Missouri Gas Energy service territory, MGE is engaged in the business of distributing and transporting natural gas 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.

3. Communications in regard to this Application and Motion should be addressed to the persons below:

Rick Zucker Associate General Counsel Laclede Gas Company 700 Market Street, 6th Floor St. Louis, MO 63101 (314) 342-0533 rick.zucker@thelacledegroup.com

Michael R. Noack Director, Pricing and Regulatory Affairs Missouri Gas Energy 7500 E. 35th Terrace Kansas City, Mo. 64129 (816) 360-5560 <u>Michael.noack@thelacledegroup.com</u>

4. Other than cases that have been docketed at the Commission, neither MGE nor Laclede has a pending action or final unsatisfied judgment or decision against it from any state or federal agency or court which involve customer service or rates within the past three years of the date of this application.

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

6. On October 28, 2015, MGE filed revised tariff sheet P.S.C. No. 6, Fourth Revised Sheet No. 24.3 ("the Revised Tariff Sheet"). Consistent with the terms of Sheet 15 of MGE's Purchased Gas Adjustment ("PGA") provisions of MGE's Tariff, the Revised Tariff Sheet has an effective date of November 13, 2015 and includes changes to both the Current Cost of Gas and the Actual Cost Adjustment factors for MGE's customers. 7. As a result of this filing, the Company's underlying charge for natural gas for firm sales customers would decrease from \$.53209 to \$.46224 per Ccf. This decrease would reduce the average monthly bill for the typical residential customer by \$4.78 or 7.3% for the upcoming year, assuming normal weather and no further change in PGA rates. For all customers, the decrease equates to a reduction of approximately \$36 million on an annual basis. With this reduction, MGE's overall rates for natural gas service would be lower than the rates that were in effect 13 years ago.

8. Because of the magnitude of the rate decrease resulting from this tariff filing, and its beneficial impact on the winter bills paid by its customers, MGE believes it is appropriate to implement the decrease as soon as reasonably practical. Accordingly, MGE respectfully requests that the Commission approve the decrease at its November 4, 2015 Agenda meeting, to be effective on November 6, 2015, or as soon as reasonably practical thereafter.

9. To the extent necessary, MGE further requests that the Commission grant it a one-time variance from Section 1B of Fifth Revised Tariff Sheet No. 15 of MGE's PGA Tariff which generally requires that PGA filings be made at least ten business days prior to their effective dates. While MGE's Revised Tariff Sheet, as filed, complies with that requirement, granting such a variance would be consistent with MGE's request to make the Revised Tariff Sheet effective sooner than ten business days after it was filed.

10. Because of the substantial decrease that would be effectuated by such action, MGE states that there will be no negative effect on MGE's customers, the general public or any other public utility if the Commission issues an order approving the Revised Tariff Sheet with the effective date recommended herein.

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11. This pleading was filed as soon as it could have been following the final calculations made for this filing and the companion PGA/ACA filing being made by Laclede on this same date.

WHEREFORE, for the foregoing reasons, Missouri Gas Energy respectfully requests that the Commission issue its Order granting the Application and Motion requested herein and approving revised tariff sheet P.S.C. No. 6, Fourth Revised Sheet No. 24.3, effective as of November 6, 2015, or as soon thereafter as reasonably practical.

Respectfully Submitted,

MISSOURI GAS ENERGY, AN OPERATING UNIT OF LACLEDE GAS COMPANY

/s/ Rick Zucker

Rick Zucker #49210 Associate General Counsel 700 Market St, 6th floor St. Louis, Missouri 63101 (314) 342-0533 (Phone) (314) 421-1979 (FAX) rick.zucker@thelacledegroup.com

<u>Certificate of Service</u>

I hereby certify that copies of the above and foregoing document were sent by electronic mail to the Commission Staff and the Office of the Public Counsel on this 28th day of October, 2015.

<u>/s/ Rick Zucker</u>

VERIFICATION

STATE OF MISSOURI SS. CITY OF ST. LOUIS

C. Eric Lobser, being duly sworn, on his oath states that he is Vice President - Rates and Regulatory Affairs for Missouri Gas Energy ("MGE"), an operating unit of Laclede Gas Company, 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.

En X C. Eric Lobser

Subscribed and sworn to before me a Notary Public in the City of St. Louis, State of Missouri, this 28th day of October, 2015.

My Commission expires: 1 ept. 24, 201.8

[seal]

Marcin a Spangler, Notary Public, State of Missouri

MARCIA A. SPANGLER Notary Public - Notary Seal STATE OF MISSOURI St. Louis County My Commission Expires: Sept. 24, 2018 Commission # 14630361