

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

In the Matter of the Application of)	
Laclede Gas Company for a Variance)	Case No. G_-2016-01__
from an EEC Tariff Provision in its)	
Laclede Service Territory)	

**VERIFIED APPLICATION FOR APPROVAL OF A
VARIANCE FROM AN EEC TARIFF PROVISION**

COMES NOW Laclede Gas Company (“Laclede” or “Company”), and files this application for approval of a variance from a tariff provision in the energy efficiency program of its Laclede service territory and in support thereof respectfully states as follows:

1. In this request, Laclede is seeking to avoid the unnecessary cost of a program evaluation for a specific energy efficiency program that is being discontinued. Laclede’s Energy Efficiency Collaborative (“EEC”) unanimously supports this request.

2. Laclede is a public utility incorporated under the laws of the State of Missouri, with its principal office located at 700 Market Street, St. Louis, Missouri 63101. 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.

3. Laclede is engaged in the business of distributing and transporting natural gas (and to a limited extent distributing liquefied petroleum gas) to customers in the City of St. Louis and the Counties of St. Louis, St. Charles, Crawford, Jefferson, Franklin, Iron, Ste. Genevieve, St. Francois, Madison, and Butler in Eastern Missouri.

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

5. Communications in regard to this Application should be addressed to the persons below:

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6. 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 within the past three years of the date of this application.

7. Effective September 27, 2013, the Commission approved Laclede's tariff filing creating Original Sheet R-45-c, which authorized Laclede to co-deliver a Residential Direct-Install Low Income Program with a local electric utility. Since December 1, 2013, Laclede has co-delivered such a program (the "Program") with Ameren. The Program completed its second year on December 1, 2015. Ameren has decided not to further extend its part of the Program, so the Program will conclude on December 31.

8. The last paragraph on Laclede Tariff Sheet R-45-c provides the following:

"A detailed post-implementation evaluation by an independent evaluation contractor selected by the EEC shall be completed within six (6) months following the conclusion of the Program's second year. If feasible, this detailed evaluation will include both a process evaluation and at a minimum, a preliminary cost-effectiveness (impact) evaluation."

Since the Program's second year concluded on December 1, 2015, the detailed evaluation would be due by June 1, 2016.

9. Laclede requests that it be granted a variance from the provisions of Sheet R-45-c of its tariff that (i) require the EEC to select an evaluator; and (ii) require the evaluation to be performed.

10. Good cause exists for the variance. Because it is expected to be fairly expensive to navigate the selection process to choose an independent contractor, and to have that independent contractor perform an evaluation, measurement and verification ("EM&V") of the Program, and because such evaluation cannot be used to determine the ongoing value of the Program since the Program is terminating, the Laclede EEC decided that proceeding with an academic EM&V process was not a cost-effective use of Program resources.

11. Laclede believes that no other public utility will be affected by this variance.

WHEREFORE, for the foregoing reasons, Laclede Gas Company respectfully requests that the Commission issue its Order granting a variance from Laclede Tariff Sheet R-45-c as requested herein.

Respectfully Submitted,

/s/ Rick Zucker

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ATTORNEY FOR LACLEDE GAS COMPANY

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

VERIFICATION

I, C. Eric Lobser, Vice President, Rates and Regulatory Affairs for 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.


C. Eric Lobser

Subscribed and sworn to before me this 9th day of December, 2015.



My Commission expires:

9-24-18

