BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Laclede Gas Company's PGA filing

) File No. GR-2015-0201

<u>APPLICATION FOR VARIANCE</u> AND REQUEST FOR EXPEDITED TREATMENT

COMES NOW 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, Laclede states as follows:

1. Laclede is a public utility and gas corporation 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.

2 In its Laclede Gas service territory, 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.

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

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

Glenn W. Buck Director, Regulatory and Finance Laclede Gas Company 700 Market Street, 5th Floor St. Louis, Missouri 63101 (314) 342-0767 glenn.buck@thelacledegroup.com

4. 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 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, Laclede filed P.S.C. MO. No. 5 Consolidated, Two Hundred and Twenty-Fourth Revised Sheet No. 29 for its Laclede Gas operating division ("the Revised Tariff Sheet"). Consistent with the terms of Sheets 15 through 28i of the Purchased Gas Adjustment ("PGA") provisions of Laclede's Tariff, the Revised Tariff Sheet has an effective date of November 13, 2015 and includes changes to both the Current Purchased Gas Adjustment and the Actual Cost Adjustment factors for Laclede's natural gas and propane subdivision customers.

7. As a result of this filing, Laclede's underlying charge for natural gas for firm sales customers would decrease from \$.51532 to \$.42101 per therm. This decrease

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would reduce the average monthly bill for the typical residential customer by \$6.95 or 9.2% 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 \$70 million on an annual basis. With this reduction, Laclede'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, Laclede believes it is appropriate to implement the decrease as soon as reasonably practical. Accordingly, Laclede 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 thereafter as reasonably practical.

9. To the extent necessary, Laclede further requests that the Commission grant it a one-time variance from Section E.2 of Fourth Revised Tariff Sheet No. 28-c of Laclede's PGA Tariff which generally requires that PGA filings be made at least ten business days prior to their effective dates. While Laclede's Revised Tariff Sheet, as filed, complies with that requirement, granting such a variance would be consistent with Laclede'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, Laclede states that there will be no negative effect on Laclede's customers, the general public or any other public utility if the Commission issues an order approving the Revised Tariff Sheets 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 Missouri Gas Energy, Laclede's other operating unit, on this same date.

WHEREFORE, for the foregoing reasons, Laclede Gas Company respectfully requests that the Commission issue its order granting this Application and Motion and approving P.S.C. MO. No. 5 Consolidated, Two Hundred and Twenty-Fourth Revised Sheet No. 29, effective as of November 6, 2015, or as soon thereafter as reasonably practical.

Respectfully Submitted,

LACLEDE GAS COMPANY

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

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

Certificate of Service

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

<u>/s/ Marcia Spangler</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 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.

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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: 28 ept. 24, 2018

[seal]

Marcia a. Spangen

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