

Rick Zucker
Associate General Counsel
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(314) 342-0533

5. 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.

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

GOOD CAUSE FOR THE REQUESTED VARIANCE

7. By order dated January 12, 2011 in Case No. GE-2011-0171 (the “January 12 Order”), the Commission granted the Company a variance from Commission Rules 4 CSR 240-40.015(4)(B) and (C), and 40.016(5)(B) and (C), which permitted Laclede to maintain affiliate transaction information on a fiscal year basis (i.e., 12 months ended September 30), rather than on a calendar year basis, and to provide such information by December 15 of the succeeding fiscal year rather than on March 15 of the succeeding calendar year. As stated in the January 12 Order, this process is both more cost-effective for Laclede and less error prone than trying to assemble information from two different financial periods. The January 12 Order was incorporated into Laclede’s CAM, which was approved by the Commission by order dated August 14, 2013 in Case No. GC-2011-0098 *et. al.* (the “August 14 Order”).

8. Due to the press of business, the Company requests a variance from the January 12 Order, the CAM and the August 14 Order to permit the Company to make its

annual CAM filing by December 22, 2016, or five business days after the current due date.

9. Good cause exists for the variance because it will help Laclede better ensure an accurate filing. In addition, Laclede believes that the five business day extension will not cause any harm to or undue burden on any party. Laclede has informed Staff of its intention to seek this extension and is authorized to represent that Staff does not oppose the request. Finally, Laclede believes that no other public utility will be affected by the variance requested herein.

REQUEST FOR RELIEF

WHEREFORE, for the foregoing reasons, Laclede Gas Company respectfully requests that the Commission issue its Order granting a variance from the January 12 Order, the CAM, the August 14 Order, and from Commission Rules 4 CSR 240-40.015(4)(B) and (C) and 40.016(5)(B) and (C), to permit the Company to make its annual CAM filing for Fiscal 2016 by December 22, 2016.

Respectfully Submitted,

/s/ Rick Zucker

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing was served on the Staff and the Office of Public Counsel, on this 14th day of December, 2016, by hand-delivery, fax, email or United States mail, postage prepaid.


/s/ Rick Zucker

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

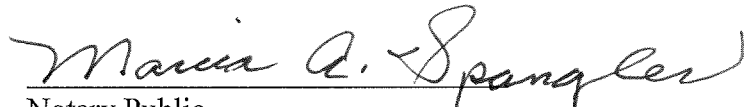
State of Missouri)
) SS.
City of St. Louis)

VERIFICATION

I, C. Eric Lobser, Vice President, Rates and Regulatory Affairs of Laclede Gas Company, being first duly sworn, verify that I am authorized to verify this Application for Variance filed on behalf of Laclede, that I am familiar with the foregoing pleading; 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 day of December, 2016.


Notary Public

