BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

In the Matter of Laclede Gas Company's)	
Application for a Variance from the)	Case No. GE-2017-0
Commission's January 12, 2011 Order)	
Regarding the Timing of CAM Annual Reports)	

APPLICATION FOR VARIANCE

COMES NOW Laclede Gas Company ("Laclede" or "Company") and, pursuant to 4 CSR 240-2.060(4), respectfully requests the Missouri Public Service Commission ("Commission") grant Laclede a variance so that the Company may file its CAM and CAM Annual Report five business days later than it would otherwise be due. In support of this Application, Laclede states as follows:

INTRODUCTION

- 1. 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. GM-2013-0254 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 to customers in eastern Missouri under the Laclede Gas operating unit, and in western Missouri under its MGE operating unit. Laclede is a gas corporation subject to the jurisdiction of the Commission.
 - 4. Communications in regard to this Application should be addressed to:

Rick Zucker Associate General Counsel Laclede Gas Company 700 Market Street, 6th Floor St. Louis, MO 63101 (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

Rick Zucker, #49211 Assistant General Counsel-Regulatory Laclede Gas Company 700 Market Street, 6th Floor St. Louis, MO 63101

Telephone: (314) 342-0533 Facsimile: (314) 421-1979

E-mail: rick.zucker@spireenergy.com

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

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	State of Missouri	aa
	City of St. Louis	SS.
		VERIFICATION
	Company, being first for Variance filed on	r, Vice President, Rates and Regulatory Affairs of Laclede Gas ally sworn, verify that I am authorized to verify this Application half of Laclede, that I am familiar with the foregoing pleading; forth therein are true and correct to the best of my knowledge,
		C. Eric Lobser
	Subscribed and sworr	before me this day of December, 2016.
		Marcia a. Spangler Notary Public
	MARCIA A. SPANGLEF Notary Public - Notary Sea STATE OF MISSOURI St. Louis County	
My ~~	Commission Expires: Sept. 2 Commission # 14630361	:018p