



Laclede Gas Company  
700 Market Street  
St. Louis, MO 63101

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Rick Zucker  
Associate General Counsel  
[Rick.Zucker@thelacledegroupp.com](mailto:Rick.Zucker@thelacledegroupp.com)

July 21, 2015

Morris Woodruff  
Secretary, Chief Regulatory Law Judge  
Missouri Public Service Commission  
Governor Office Building  
200 Madison Street  
P. O. Box 360  
Jefferson City, MO 65102-0360

Dear Mr. Woodruff:

Transmitted herewith for electronic filing with the Missouri Public Service Commission ("Commission") are revised tariff sheets (the "Revised Tariffs") for the Laclede Gas ("Laclede Gas") and Missouri Gas Energy ("MGE") operating units of Laclede Gas Company ("Company"). The revised tariff sheets have an issue date of July 21, 2015 and an effective date of September 8, 2015. The purpose of the Revised Tariffs is two-fold. The first is to achieve greater consistency through which the Company's two operating units provide service to their respective customers. The second is to incorporate corresponding changes that were made by the Commission to its Chapter 13 billing rules in 2014.

With respect to achieving greater consistency between the Company's two operating units, the Revised Tariffs propose to: (1) adopt for MGE the same budget billing and main extension tariffs currently approved for Laclede Gas; and (2) reintroduce for both operating units the same procedure for estimating bills that relies more heavily on historical usage at the customer's own location, consistent with the procedure previously used for this purpose.

Laclede believes that achieving greater consistency will enhance the ability of its call center personnel to respond effectively and efficiently to customer inquiries and issues that may arise in these areas. Greater consistency should also enhance the ability of Commission personnel to effectively monitor the performance of the Company's operating units in these same areas. The adoption of similar practices will also assist the Company in avoiding duplicative programming costs as it converts MGE to its Customer Care & Billing ("CC&B") system in early September of this year, provided that such changes are approved sufficiently in advance of the estimated September 8<sup>th</sup> conversion date.

Notably, none of these tariff revisions will increase the rates or charges paid by any customer. In fact, all customer charges, usage charges and miscellaneous charges approved for MGE and Laclede would continue in effect as they are today. The Company's filing of the Revised Tariffs is also fully consistent with the Stipulation and Agreement approved by the Commission in GM-2013-0254. In that Stipulation and Agreement, the parties agreed that Laclede would not file a general rate case prior to October 1, 2015 or propose changes to certain terms and conditions of its tariffs for transportation service, absent agreement by the parties. The Stipulation and Agreement left the Company free, however, to seek tariffs changes relating to the terms, conditions and practices associated with providing non-transportation services, as it has done here. Among such tariff changes are those like the ones the Company is proposing so that it can implement the same budget billing process for both of its operating units – a result that is, in turn, absolutely essential to the Company's ability to achieve its integration goal of replacing MGE's old Customer Service System with Laclede's much newer CC&B system. The Company's plan to achieve this integration goal in 2015 was fully disclosed at the time the Stipulation and Agreement in Case No. GM-2013-0254 was negotiated and, as previously noted, the Agreement itself provides the Company with the flexibility necessary to seek, and obtain approval for, the kind of tariff changes necessary to achieve this goal.

Prior to making this filing, the Company did provide copies of the Revised Tariffs to the Commission Staff ("Staff") and the Office of the Public Counsel ("OPC") and met at least twice with both parties in an effort to discuss the tariffs and solicit their input. Although it is the Company's understanding that the Staff and, perhaps, OPC will address the Revised Tariffs in their own filings, the Company remains open and committed to continue working on a constructive basis with both parties.

Respectfully submitted,

**/s/ Rick Zucker**

Rick Zucker