BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

In the Matter of Spire Missouri's)	
Application for a Variance from the)	Case No. GE-2018-0
Commission's January 12, 2011 Order)	
Regarding the Timing of CAM Annual Reports)	

APPLICATION FOR VARIANCE

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

INTRODUCTION

- Spire is a public utility incorporated under the laws of the State of
 Missouri, with its principal office located at 720 Olive Street, St. Louis, Missouri 63101.
- 2. A Certificate of Good Standing evidencing the Company'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. Through its Spire Missouri East and West Divisions, Spire is engaged in the business of distributing and transporting natural gas to customers in Eastern and Western Missouri.
 - 4. Communications in regard to this Application should be addressed to:

Rick Zucker Associate General Counsel Laclede Gas Company 720 Olive Street, 14th Floor St. Louis, MO 63101 (314) 342-0533

- 5. Other than cases that have been docketed at the Commission, Spire 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. Spire 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 fact that the personnel who would prepare Spire's CAM are involved in Spire Missouri's pending rate case hearings in Case No. GR-2017-0215, an extension of thirty days is needed to file the CAM and CAM Report for the previous

year.

9. Good cause exists for the variance because it will help Spire better ensure an accurate filing as our employees are currently involved in the hearings of the pending rate case. In addition, Spire believes that the thirty-day extension will not cause any harm to or undue burden on any party.

REOUEST FOR RELIEF

WHEREFORE, for the foregoing reasons, Spire Missouri Inc. 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 2017 by January 15, 2018.

Respectfully Submitted,

/s/ Rick Zucker

Rick Zucker, #49211 Assistant General Counsel-Regulatory Spire Missouri, Inc. 720 Olive Street, 14th Floor St. Louis, MO 63101

Telephone: (314) 342-0532 Facsimile: (314) 342-9577

E-mail: rick.zucker@thelacledegroup.com

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing Application for Variance was served on the General Counsel of the Staff of the Missouri Public Service Commission and the Office of Public Counsel, on this 14th day of December, 2017, 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

City of St. Louis) SS.)
	<u>VERIFICATION</u>
sworn, verify that I of Spire Missouri, I	ker, Associate General Counsel of Spire Missouri Inc, being first duly am authorized to verify this Application for Variance filed on behalf inc., that I am familiar with the foregoing pleading; and that the erein are true and correct to the best of my knowledge, information
	/s/ Rick Zucker Rick Zucker