

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.

REQUEST 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@thelacledgroup.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)
) SS.
City of St. Louis)

VERIFICATION

I, Rick Zucker, Associate General Counsel of Spire Missouri Inc, being first duly sworn, verify that I am authorized to verify this Application for Variance filed on behalf of Spire Missouri, Inc., 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.

/s/ Rick Zucker
Rick Zucker