

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

In the Matter of Laclede Gas Company's Verified)	
Application to Re-Establish and Extend the)	Case No. GF-2015-0181
Financing Authority Previously Approved by the)	
Commission.)	

MOTION TO EXTEND CURRENT FINANCING AUTHORITY
PENDING DISPOSITION OF APPLICATION,
MOTION FOR ORDER SETTING EARLY PREHEARING CONFERENCE,
AND MOTION FOR EXPEDITED TREATMENT

COMES NOW Laclede Gas Company ("Laclede" or "Company"), and in support of its motions to extend its current financing authority pending the disposition of its Application in this case, to set an early prehearing conference, and for expedited treatment, states as follows:

1. On April 15, 2015, Laclede filed its Verified Application in the above-referenced case in which it requested Commission authorization to re-establish and extend the financing authority previously granted by the Commission on June 16, 2010 in its report and order in Case No. GF-2009-0450 (the "2010 Order"). In the 2010 Order, which was attached to the Company's Application in this case, the Commission authorized Laclede, subject to certain terms and conditions, to issue registered securities and common stock, receive paid-in-capital, accept private placement investments and enter into capital leases (the "Financings") in an overall amount not to exceed \$518 million.

2. Such authorization was granted to Laclede for a three-year period, expiring on June 30, 2013. By Order dated October 24, 2012 in Case No. GF-2013-0085, such authorization was extended until June 30, 2015.

3. In its Application in this case, the Company sought to extend this financing authority for another three years, and demonstrated, based on the formula provided by the Commission in the 2010 Order, that it was entitled to \$1.001 billion in financing authority.¹ Notwithstanding this amount of authority, in its Application, Laclede voluntarily reduced its request to \$550 million. This amount is only slightly larger than the amount granted in the 2010 Order, despite the facts provided in footnote 1 below.

4. Authority in the amount of \$370 million remains from the original \$518 million authorized in 2010, and is set to expire on June 30. In this motion, Laclede requests that the Commission extend the financing authority from June 30 to the effective date of an order deciding and disposing of this case.

5. The Company believed that the substantial reduction in the authority requested (from \$1.001 billion to \$550 million) would garner Staff's support and that a hearing would not be necessary. However, on June 8, 2015, the Staff issued its recommendation in which it proposed that the Commission authorize only \$300 million in financing authority over a period ending on September 30, 2018.

6. Since June 8, the Company and Staff have not been able to resolve their differences over the amount of financing authority that should be granted by the Commission in this case. Laclede therefore recommends that an early prehearing conference be established so that the parties can develop and propose a procedural

¹ The increase in the amount requested from the 2009-2010 case is due to the acquisition of MGE and the acceleration of capital investments in safety infrastructure.

schedule for resolving their differences if a mutually agreeable resolution remains elusive.

7. In the meantime, Laclede asks that the Commission extend its financing authority, subject to all existing terms and conditions applicable to such authority, until the effective date of a Commission order resolving the issues raised in this proceeding and disposing of the Company's Application in this case. Laclede believes such an extension is appropriate for four reasons. First, as evidenced by the \$370 million in remaining authority, Laclede has been an effective and conservative steward of its finances. Second, the time period is actually superfluous, as the dollar limit by itself suffices as a check on Laclede's ability to enter into long-term financing arrangements. Third, all of the limiting terms and conditions prohibiting imprudent behavior remain in place; only the time limit would shift. Fourth, an extension of \$370 million in authority until the end of this case is only modestly above the \$300 million authority recommended by Staff itself for a period of three-plus years.

MOTION FOR EXPEDITED TREATMENT

8. Because the authority is expiring on June 30, Laclede asks that the Commission approve this motion on or before June 24. The Company believes that it is important to investors for Laclede to keep its financing authority intact at all times. Thus, if the Commission acts by the requested date, harm will be avoided, as the market will retain its confidence in Laclede's ability to obtain financing. There will be no negative effect on Laclede's customers or the general public if the Commission grants this motion.

9. Laclede again believed that Staff would be amenable to an agreed extension of the financing authority under these circumstances. Laclede was surprised to

find that Staff was only willing to extend the authority for a short period, too short to administer this case. This would result in the Commission either conforming its schedule to accommodate an arbitrary and insufficient deadline for litigating the issues in this case or require that Laclede file another request for extension in the middle of the case. There is simply no reason why such an artificial constraint should be imposed, given the demonstrably prudent manner in which Laclede has exercised its financing authority in the past and the fact that the financing authority which Laclede's seeks to continue with this request is significantly lower than what the Commission has previously determined to be appropriate under its relatively recent interpretation of Missouri law. This pleading is being filed as soon as it could be following the impasse with Staff over this matter.

WHEREFORE, for the foregoing reasons, Laclede Gas Company respectfully requests that the Commission issue its Order by June 24, 2015: (a) extending the Company's existing financial authority, as granted in Case No. GF-2009-0450 and extended in Case No. GF-2013-0085, until the effective date of a Commission order finally disposing of the Company's Application in this case; and (b) scheduling a prehearing conference so that the parties can develop and propose a procedural schedule for addressing the issues raised in this proceeding; and (c) granting such other and further relief to which Laclede may be entitled.

Respectfully submitted,

LACLEDE GAS COMPANY

By: **/s/ Rick Zucker**

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Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing pleading was served on all parties of record on this 17th day of June 2015 by hand-delivery, e-mail, fax, or regular U.S. mail.

/s/ Rick Zucker