



expected by all parties involved, and therefore, a notice is superfluous and not meaningful.

3. In a previous Laclede Gas ISRS case, Case No. GO-2011-0361, Laclede argued that Rule 4.020(2) should be waived based on the regular and routine nature of both ISRS filings and the cases themselves, which cases were not contested and in which no hearings had been held. The Commission granted the waiver.

4. Given OPC's actions in recent rate cases, it is difficult to determine whether any future ISRS filings may require a hearing. However, the routine and regular filings of the twice per year applications have not changed. Providing 60 day notice of these filings is therefore nothing more than a procedural barrier to making progress that has no corresponding benefit. Laclede therefore asks that the 60 day notice requirement be waived for Laclede Gas and MGE ISRS filings.

5. In the event that the waiver is not granted for all Laclede Gas and MGE ISRS filings, Laclede asked that it be waived for their next ISRS filings, so that Laclede may file applications in early August, which is a little less than 60 days from today.

6. In the event that the waiver is not granted at all, Laclede hereby provides notice that it intends to file its next ISRS cases in 60 days. It is unclear what, if any, issues are likely to be before the Commission in those cases, although it is possible that the cases may include the issue of updating proforma ISRS cost estimates.

**WHEREFORE**, Laclede respectfully requests that the Commission waive the notice requirements of Commission Rule 4.020(2) for future Laclede and MGE ISRS Cases, or in the alternative, waive Rule 4.020(2) for their next upcoming ISRS cases, or in the alternative, accept this Notice regarding Laclede and MGE's upcoming ISRS case filings.

Respectfully submitted,

**/s/ Rick Zucker**

Rick Zucker, Mo. Bar #49211

Associate General Counsel

Laclede Gas Company

700 Market Street, 6<sup>th</sup> Floor

St. Louis, MO 63101

Telephone: (314) 342-0532

Fax: (314) 421-1979

Email: rick.zucker@spireenergy.com

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing pleading has been duly served upon the General Counsel of the Staff and on the Office of the Public Counsel by hand delivery, email, fax, or United States mail, postage prepaid, on this 9th day of June, 2016.

**/s/ Marcia Spangler**