

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

In the Matter of Laclede Gas Company's) **File No. GR-2017-0215**
Request to Increase Its Revenues for Gas) **Tariff No. YG-2017-0195**
Service)

In the Matter of Laclede Gas Company d/b/a) **File No. GR-2017-0216**
Missouri Gas Energy's Request to Increase) **Tariff No. YG-2017-0196**
Its Revenues for Gas Service)

AFFIDAVIT

Spire Exhibit No. 63
Date 1/3/18 Reporter MY
File No. GR-2017-0215
GR-2017-0216

STATE OF MISSOURI)
) **SS.**
CITY OF ST. LOUIS)

Glenn W. Buck, of lawful age, being first duly sworn, deposes and states:

1. My name is Glenn W. Buck. My business address is 700 Market Street, St. Louis, Missouri 63101; and I am Director, Regulatory and Finance for Spire Missouri Inc., formerly known as Laclede Gas Company ("LAC"). I have previously submitted Direct, Rebuttal, Surrebuttal and True-up testimony in this case.

2. I have reviewed the Weather Normalization Adjustment Rider Tariff (hereinafter "WNAR Tariff") that was submitted by the Staff on the last day of the evidentiary hearing in these proceedings and marked as Exhibit 281. The Company reserved the right to comment on this tariff during the true-up hearing. While the Company is open to considering the Weather Normalization Tariff in place of the Revenue Stabilization Mechanism ("RSM") it has proposed in these cases, there are several changes that would need to be made to the WNAR Tariff to make it an acceptable and workable alternative to the RSM.

3. First, like the proposed RSM, the WNAR Tariff should be approved for both LAC's and MGE's Residential and Small General Service Classes. Because the WNAR Tariff adjustments would not vary based on non weather-related changes in customer usage, Staff's

previous objections to applying the RSM to the Small General Service Classes should not be an obstacle to applying the WNAR Tariff to these classes.

4. Second, the arbitrary \$0.01 per therm (or ccf) limit on adjustments that can be made under the WNAR Tariff should be eliminated as its practical effect would be to substantially increase rather than mitigate the exposure of both the Company and its customers to the financial impact of weather-related changes in customer usage compared to today. This would effectively eviscerate the entire purpose of such a tariff. Elimination of this adjustment limit would also be consistent with the operation of the Company's PGA clause, the statute that authorizes this kind of mechanism and the vast majority of similar clauses approved in other jurisdictions. If the Commission determines that some limit is appropriate, I would recommend that it: (1) be a limit only on *upward* adjustments and (2) that it be set at \$0.05 per therm or ccf. This would ensure that any monthly increase for the average customer would not exceed \$3.35 while providing customers with an opportunity to receive a larger monthly decrease if the weather is exceptionally cold. The WNAR Tariff should also provide that any adjustment amounts falling outside the \$0.05 limit would be deferred for recovery from customers in the next WNAR adjustment.

5. Third, the WNAR Tariff should allow for at least three adjustments per year, including the annual required one. If the WNAR is to provide bill relief to customers in a cold winter and balances are to be kept at appropriate levels, at least 3 adjustments should be authorized, provided that, like the PGA mechanism, there must be at least 60 days between each adjustment.

6. I hereby swear and affirm that the information contained herein is true and correct to the best of my knowledge and belief.

Glenn Buck

Glenn W. Buck

Subscribed and sworn to before me this 2nd day of January, 2018.

Marcia A. Spangler

Notary Public

