

**STATE OF MISSOURI
PUBLIC SERVICE COMMISSION**

At a session of the Public Service Commission held at its office in Jefferson City on the 28th day of September, 2022.

In the Matter of the Application of Summit)
Natural Gas of Missouri, Inc. for a Waiver)
from Commission Rule 20 CSR 4240-)
14.020(1)(D) and 14.030(3) Relating to)
Promotional Practices)

File No. GE-2023-0104

**ORDER GRANTING WAIVERS
AND GRANTING MOTION FOR EXPEDITED TREATMENT**

Issue Date: September 28, 2022

Effective Date: October 10, 2022

On September 15, 2022, Summit Natural Gas of Missouri (SNGMO) filed a request for a waiver from Commission Rules 20 CSR 4240-14.020(1)(D) and 14.030(3) relating to promotional practices to promote the use of high energy efficiency appliances through implementation of a Trade Ally Rebate. SNGMO also asked for expedited treatment, requesting a Commission order be effective by October 10, 2022. SNGMO also requested waiver of the Commission's 60-day notice requirement under 20 CSR 4240-4.017.

SNGMO's current tariff includes an Equipment Rebate Program (ERP) Pilot. The purpose of the ERP Pilot is to: (1) promote the installation of high efficiency natural gas equipment within SNGMO's service territories by offering rebates that are expected to be cost effective; and, (2) to perform an evaluation of the program implementation and results. Under the ERP Pilot, SNGMO provides financial incentives, in the form of a rebate, to eligible customers who purchase and install energy efficient gas boilers, furnaces, smart thermostats, and tankless water heaters. The ERP Pilot has been extended through December 31, 2024, with Commission approval in File No.

GT-2022-0052. The Commission found the pilot program should be extended because “the program benefits customers and promotes energy efficiency.”¹ Additionally, Staff of the Commission (Staff) found the ERP Pilot had shown increased customer participation and success since its launch in 2018.² As part of the current ERP Pilot, SNGMO requested to offer a Trade Ally Rebate. The rebate would incentivize installers with a fifty-dollar (\$50) rebate for assisting eligible customers with the rebate submission process for each unit of gas equipment installed. SNGMO affiliates have utilized this inducement in other jurisdictions, which has resulted in overall higher participation rates in energy efficiency programs.

SNGMO has reviewed its current, Commission-approved budget, and states that the impact of this additional rebate would be minimal to the SNGMO’s overall energy efficiency budget. SNGMO calculates an increase in overall incentive spending of approximately ten percent. SNGMO would like to implement the Trade Ally Rebate Program on October 1, 2022 or as soon thereafter as practical, in an effort to coincide with the launch of a new rebate submission portal on October 10, 2022, across most jurisdictions for Summit Utilities, Inc. (SNGMO’s parent company) subsidiaries.

The Commission issued notice of SNGMO’s requests, shortened the date for responses, and directed Staff to file a recommendation. On September 26, 2022, Staff indicated it had no objection to SNGMO’s requests. No other responses were received.

¹ File No. GT-2022-0052, *Order Approving Application and Tariff* (Issued October 27, 2021), p. 2.

² File No. GT-2022-0052, *Order Approving Application and Tariff* (Issued October 27, 2021), p. 2.

After reviewing the requests for waivers and Staff's response, the Commission finds good cause to grant SNGMO waivers from Commission Rules 20 CSR 4240-14.020(1)(D) and 14.030(3) relating to promotional practices as requested.

SNGMO also requested a waiver of Commission Rule 20 CSR 4240-4.017(1). SNGMO submitted a verified declaration that it had no communications with the office of the Commission in 150 days prior to the filing regarding any substantive issue likely to be in the case. The Commission finds that good cause exists to approve the waiver of the 60-day notice requirement in 20 CSR 4240-4.017(1). The Commission further finds it reasonable to make this order effective in less than 30 days.

THE COMMISSION ORDERS THAT:

1. SNGMO is granted a waiver from Commission Rule 20 CSR 4240-14.020(1)(D) and 14.030(3) relating to promotional practices to offer a Trade Ally Rebate as requested.
2. For purposes of this case, SNGMO is granted a waiver of the 60-day notice requirement in 20 CSR 4240-4.017(1).
3. This order shall become effective on October 10, 2022.



BY THE COMMISSION

A handwritten signature in black ink that reads "Morris L. Woodruff".

Morris L. Woodruff
Secretary

Silvey, Chm., Rupp, Coleman, Holsman, and
Kolkmeier CC., concur.

Dippell, Deputy Chief Regulatory Law Judge


STATE OF MISSOURI

OFFICE OF THE PUBLIC SERVICE COMMISSION

I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.

WITNESS my hand and seal of the Public Service Commission,
at Jefferson City, Missouri, this 28th day of September, 2022.





Morris L. Woodruff
Secretary

MISSOURI PUBLIC SERVICE COMMISSION

September 28, 2022

File/Case No. GE-2023-0104

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Enclosed find a certified copy of an Order or Notice issued in the above-referenced matter(s).

Sincerely,



**Morris L. Woodruff
Secretary**

Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.