

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

In the Matter of the Revision to the Residential)	
Direct-Install Low Income Component of Laclede)	<u>File No. GO-2015-0149</u>
Gas Company's Energy Efficiency Programs)	Tariff No. YG-2015-0223

**STAFF RECOMMENDATION FOR COMMISSION APPROVAL
OF THE TARIFF ON AN EXPEDITED BASIS**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its recommendation regarding *Laclede Gas Company's Motion for Expedited Treatment* of its tariff sheet P.S.C. MO. No. 5 Consolidated First Revised Sheet No. R-45-c, Staff recommends the Commission approve the tariff on an expedited basis. In support thereof, Staff states:

1. On December 18, 2014, Laclede Gas Company ("Laclede" or "Company") filed the tariff described above to modify the Company's Residential Direct-Install Low Income Program ("DILIP") with an effective date of January 18, 2014. Concurrently with the tariff filing, Laclede filed a motion for expedited treatment requesting an effective date of January 2, 2015.

2. Also on December 18, 2014, the Commission ordered Staff to file its recommendation in this matter no later than December 23, 2014.

3. The purpose of the revised tariff sheet is to update the program description and its availability to properties with a combination of federally subsidized units and non-subsidized units.

4. Laclede co-delivers this program with the local electric utility provider so that eligible customers utilizing both services may receive energy savings and bill reductions from both energy sources. The local electric utility provider has already

implemented these proposed revisions in its program. Laclede is requesting expedited treatment so the newly eligible buildings can begin the new year with matching gas and electric programs.

5. As explained in Staff's recommendation, attached here as Appendix A and incorporated by reference, Staff agrees that good cause exists for expedited treatment in this matter. Staff recommends the Commission approve the tariff on an expedited basis and permit the tariff to become effective on January 2, 2015.

WHEREFORE, Staff recommends the Commission approve tariff sheet P.S.C. MO. No. 5 Consolidated First Revised Sheet No. R-45-c on an expedited basis.

Respectfully submitted,

/s/ Marcella L. Mueth

Marcella L. Mueth
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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this **23rd day of December, 2014**.

/s/ Marcella L. Mueth

MEMORANDUM

TO: Missouri Public Service Commission Official Case File,
Case No. GO-2015-0149, File No. YG-2015-0223, Laclede Gas Company

FROM: Kory Boustead, Energy – Tariffs / Rate Design

/s/ Thomas M. Imhoff 12/22/2014
Energy Department/Date

/s/ Marcella L. Mueth 12/22/14
Staff Counsel's Office/Date

SUBJECT: Staff Recommendation Regarding Laclede Gas Company's Modification of Residential Direct-Install Low Income Program and Motion to Approve Tariff Filing on Less than Thirty Days' Notice and Motion for Expedited Treatment

DATE: December 22, 2014

On December 18, 2015, Laclede Gas Company ("Laclede" or "Company") filed with the Missouri Public Service Commission ("Commission") one (1) tariff sheet proposing to make a modification to the Company's Residential Direct-Install Low Income Program (Program) with an effective date of January 18, 2014 and a Motion to Approve Tariff Filing on Less than Thirty Days' Notice and Motion for Expedited Treatment requesting an effective date of January 2, 2015.

The Program delivers long-term natural gas savings and bill reductions to low income customers who occupy multifamily and single-family dwelling units within the Company's service territory. This is achieved through direct-install water consumption reduction and heat retention measures at no cost to participating customers. The program will also provide residents of the dwelling units with education on the use of the natural gas conservation measures.

The purpose of the revised tariff sheet is to update changes in the program description and its availability to match the terms of the Company's tariff to those of Ameren Missouri's program, regarding eligibility of multi-family dwelling units to participate in the program.

The change in the availability section added the following:

- "In properties with a combination of federally subsidized units and non-subsidized units, at least 51% shall be federally subsidized to receive incentives under the Program for the entire building. For multifamily properties with less than 51% federal subsidized units, the owner or manager will be required to verify installation of comparable qualified energy efficiency measure at their own expense in all non-subsidized units, at which time the Program may upgrade all remaining eligible units with qualified efficiency measures."

The change in the program description section added the following wording to the second sentence:

- "federally subsidized housing units within"

By reconciling these terms, the buildings that are eligible for the electric program will also be

eligible for the gas program, and the program provider will not have to distinguish between the two.

The Company co-delivers the Program with the local electric utility provider, Ameren Missouri, so that eligible customers utilizing both services may receive energy savings and bill reductions from both energy sources. Ameren Missouri's program has been revised and is already in effect.

Laclede is requesting expedited treatment so the eligible buildings can begin the new year with matching gas and electric programs. The program has seen rapid success, but what is currently available will soon be saturated without the change to broaden the availability of properties.

Staff Recommendation

The Commission's Energy Department - Tariffs/Rate Design Staff ("Staff") has reviewed the tariff sheet, as filed by Laclede on December 18, 2014, and is of the opinion that these sheets were filed in compliance with the Commission's Order and Rules and that good cause has been shown for expedited treatment. Therefore, Staff recommends that the following tariff sheet, filed on December 18, 2014 be approved with an effective date of January 2, 2015:

P.S.C. MO. No.5 Consolidated

First Revised Sheet No. R-45-c, CANCELING Original Sheet No. R-45-c

The Staff has verified that Laclede has filed its annual report and is not delinquent on any assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

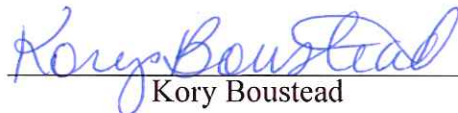
**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Revision to the)
Residential Direct-Install Low Income)
Component of Laclede Gas Company's)
Energy Efficiency Programs) Case No. GO-2015-0149

AFFIDAVIT OF KORY BOUSTEAD

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

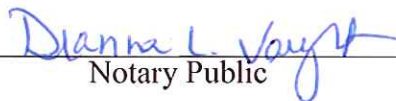
Kory Boustead of lawful age, on oath states: that she participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was provided to her; that she has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of her knowledge and belief.



Kory Boustead

Subscribed and sworn to before me this 22nd day of December, 2014.

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: June 28, 2015
Commission Number: 11207377



Notary Public