

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

In the Matter of Laclede Gas Company’s) **Case No. GT-2017-**
Proposed Rebate Tariff Sheet Filing) Tariff No. JG-2017-0151

**MOTION TO SUSPEND OR REJECT TARIFF AND
MOTION FOR EXPEDITED TREATMENT**

COMES NOW the Staff of the Missouri Public Service Commission and for its *Motion to Suspend or Reject Tariff and Motion for Expedited Treatment* (“Motion”) respectfully states as follows:

1. On January 23, 2017, Laclede Gas Company (“Laclede” or “Company”) filed P.S.C. MO. No. 5 Consolidated, Second Revised Sheet No. R-46-b, with a proposed effective date of February 22, 2017. This filing was assigned Tariff Tracking No. JG-2017-0151. Laclede filed a substitute tariff sheet in the JG-2017-0151 file on February 8, 2017, a copy of which is attached hereto.

2. Laclede’s tariff sheet filing constitutes a “promotional practice” as that term is defined by 4 CSR 240-14.010(6). Pursuant to the Commission’s requirements for promotional practices, no gas utility shall offer a promotional practice until a tariff filing has been made with the Commission.

3. The Commission’s rules governing gas utility promotional practices also require the utility demonstrate that promotional practices such as the proposed tariff sheet are cost-effective. See 4 CSR 240-3.255(2)(B) and 4 CSR 240-14.010.

4. Laclede has not demonstrated that all of the new or revised rebate provisions on its proposed revised tariff sheet are cost-effective demand side resources. More specifically, the proposed new rebate in the commercial portfolio for “Gas storage

water heater greater than or equal to 20 gallons and less than or equal to 55 gallons” does not appear to have been analyzed using the cost-effectiveness tests.

5. Since the Company has not demonstrated that all of the new or revised rebates on its proposed revised tariff sheet are cost-effective, the tariff sheet should either be rejected or suspended for the maximum suspension period in order to allow the Company to demonstrate that all of the proposed new rebates are cost-effective.

Motion for Expedited Treatment

6. Because the tariff sheet at issue has a proposed effective date of February 22, 2017, pursuant to 4 CSR 240-2.080(14) Staff requests the Commission act to either reject or suspend the tariff sheet effective no later than February 21, 2017. This will prevent a potentially non-cost-effective promotional practice from going into effect, and should have no negative effect since currently approved practices will remain in effect. This pleading was filed as soon as it could have been given the number of other cases currently on Staff’s schedule.

WHEREFORE Staff respectfully requests that the Commission issue an order with an effective date no later than February 21, 2017, rejecting or suspending Laclede’s tariff filing P.S.C. MO. No. 5 Consolidated, Second Revised Sheet No. R-46-b, Tariff Tracking No. JG-2017-0151, for the maximum suspension period.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record this 14th day of February, 2017.

/s/ Jeffrey A. Keevil

P.S.C. MO. No. 5 Consolidated Second Revised Sheet No. R-46-b
CANCELLING P.S.C. MO. No. 5 Consolidated, First Revised Sheet R-46-b Schedules
Laclede Gas Company For Refer to Sheet No. R-1

Name of Issuing Corporation or Municipality

Community, Town or City

RULES AND REGULATIONS

35. Conservation and Energy Efficiency Programs (continued)

Equipment or Service	Rated	Rebate
Gas space heating hot water boiler less than 300 MBH input	Greater than or equal to 85% and less than 92% AFUE*	\$2.50 per MBH
Gas space heating hot water boiler from 300 MBH to 2,500 MBH input	Greater than or equal to 85% and less than 92% TE**	
Gas space heating hot water boiler greater than 2,500 MBH to 5,000 MBH input	Greater than or equal to 85% and less than 92% CE***	
Gas space heating hot water boiler less than 300 MBH input	Greater than or equal to 92% AFUE*	\$3.00 per MBH
Gas space heating hot water boiler from 300 MBH to 2,500 MBH input	Greater than or equal to 92% TE**	
Gas space heating hot water boiler greater than 2,500 MBH to 5,000 MBH input	Greater than or equal to 92% CE***	
Gas space heating steam boiler less than 300 MBH input	Greater than or equal to 82% AFUE*	\$1.75 per MBH
Gas space heating steam boiler from 300 MBH to 5,000 MBH input	Greater than or equal to 82% TE**	
Space Heating steam trap replacement or rebuild	Steam trap replacement or rebuild of failed trap considered efficiency improvement	50% of the equipment cost for trap replacement or rebuild kit, up to \$100 per steam trap
Process and/or industrial steam trap replacement or rebuild	Steam trap replacement or rebuild of failed trap considered efficiency improvement	50% of the equipment cost for trap replacement or rebuild kit, up to \$200 per steam trap
Vent damper	Damper installation considered efficiency improvement	50% of equipment cost or \$500 cap per boiler, whichever is lower
Primary air damper	Damper installation considered efficiency improvement.	50% of equipment cost or \$500 cap per boiler, whichever is lower
Gas Instantaneous Water Heater < 2 gallon	Greater than or equal to 0.82 EF****	\$300
Gas storage water heater greater than or equal to 20 gallons and less than or equal to 55 gallons	Greater than or equal to 0.67 EF****	\$200
Condensing Storage Water Heater Greater than 75,000 and less than or equal to 500,000 BTU/hour input	Greater than or equal to 90% TE**	\$450

*Annual Fuel Utilization Efficiency (AFUE) ** Thermal Efficiency (TE)
 Combustion Efficiency (CE) *Energy Factor (EF)

MBH is a thousand BTUs per hour

DATE OF ISSUE January 23, 2017 DATE EFFECTIVE February 22, 2017

 Month Day Year Month Day Year
 ISSUED BY C. Eric Lobser, VP - Regulatory and Governmental Affairs, 700 Market, St. Louis, Mo. 63101

 Name of Officer Title Address