

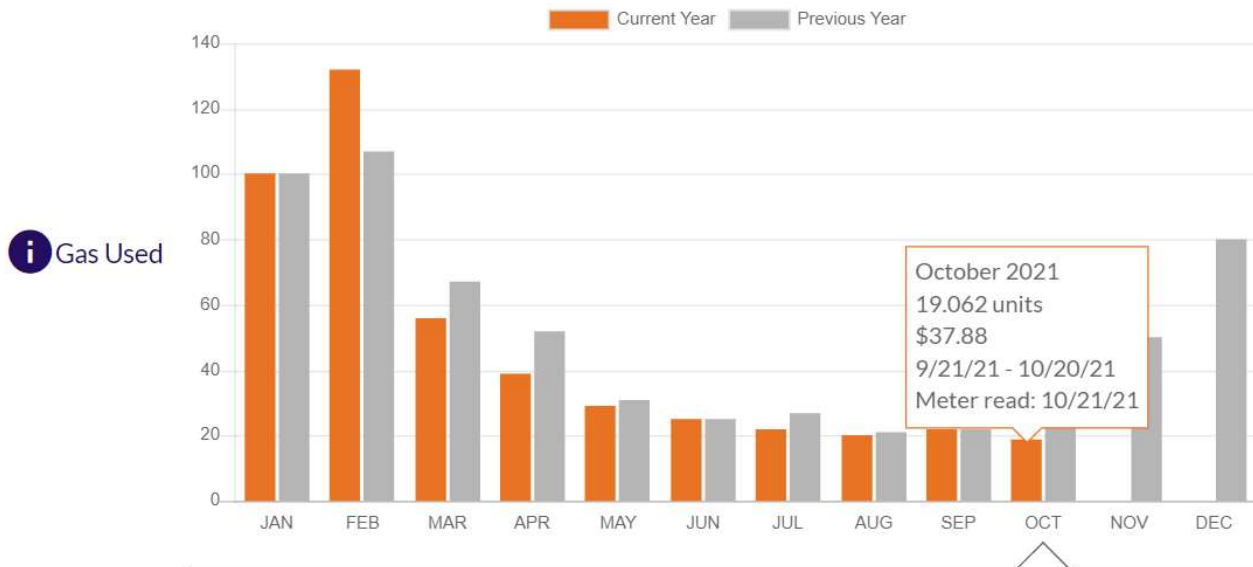
Comments of Mark E. Krebs supporting STL Pipeline (Docket number CP17-40-007)

I have been a residential customer of Spire (formerly Laclede Gas) since 1994. For the sake of full disclosure, between 1994 and February 2021, I was also a Spire employee; most recently, as its energy policy specialist. I have not received any form of compensation from Spire since my retirement; no do I expect any in the future. Before being recruited to Laclede in 1994, I worked for an Austin Texas based gas utility in in a similar capacity. On several instances during that time, I was an expert witness for the plaintiff, the Environmental Defense Fund (EDF), to intervene against what was then the largest electric utility in Texas, the "Texas Utilities Electric Company" (a.k.a., TU, since deceased¹).

The following comments are solely my own. They are submitted as a concerned consumer to protect my economic interests and those of my neighbors and community and not as an agent for Spire.

The issue at hand should be whether the STL Pipeline legitimately serves the best interests of Spire Missouri’s customer base. Spire has estimated that during last February’s polar vortex event (a.k.a., “Winter Storm Uri”) that it saved its customers \$300 million and, not having this capacity available, could put over 650,000 St. Louis homes and businesses at risk of curtailments.

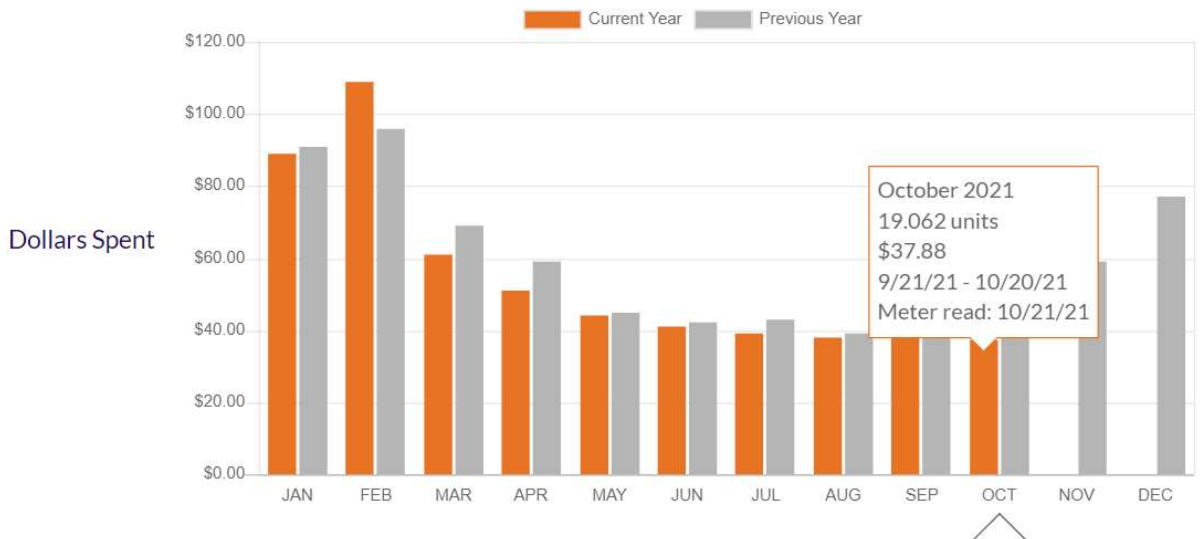
While I can’t confirm Spire’s estimates, I can say and show what I was billed for the amount consumed both prior to, during and since February 2021 was more than reasonable; all things considered. More importantly, my household was spared the hardships that was borne by many other utilities and their customers from this event.² The following two graphs are screenshots of my billing history for the last two years:³



¹ The saga of TU ‘s demise is documented here: <https://www.masterresource.org/krebs-mark/regulatory-assistance-project-anti-gas/>

² https://en.wikipedia.org/wiki/February_13%E2%80%9317,_2021_North_American_winter_storm

³ <https://myaccount.spireenergy.com/web/customer/registration#/sign-in>



FERC should through environmentalists' ploys against consumer choice by forcing utility change they deem desirable. In this case, FERC should consider how EDF sought and found an activist court willing to reopen an approved FERC permit to shut down a fully approved and operational gas pipeline. If EDF's strategy succeeds, this may represent a new phase of forcing people to stop using fossil fuels. These strategies are well documented. See [Category Archives: Krebs, Mark](#)⁴ for more information.

The Natural Resource Defense Council's (NRDC's) "[Sustainable FERC](#)," which the EDF is closely affiliated with, is also involved in these strategies as documented below:⁵

- Protest of/Comment on Spire STL Pipeline LLC's Application For a Temporary Emergency Certification, or, in the Alternative, Limited-Term Certificate of Sierra Club, New Jersey Conservation Foundation, The Sustainable FERC Project, Natural Resources Defense Council⁶
- PL18-1-NOI-PIO-Comments-FINAL⁷

"The Sustainable FERC Project is a coalition of state, regional and national environmental and other public interest organizations [including EDF] working to expand the deployment of clean energy resources into America's electricity transmission grid." Together, their [advocacy](#) mission includes the following:

1. [REMOVING MARKET BARRIERS O CLEAN ENERGY](#)
2. [REFORMING GAS PIPELINE POLICIES](#)
3. [TRANSMISSION FOR A DECARBONIZED FUTURE](#)

⁴ <https://www.masterresource.org/category/krebs-mark/>

⁵ <https://sustainableferc.org/?s=Environmental+Defense+Fund>

⁶ <https://sustainableferc.org/?s=%E2%80%A2%09Protest+of%2FComment+on+Spire+STL+Pipeline+LLC%E2%80%99s+Application+For+a+Temporary+Emergency+Certification%2C+or%2C+in+the+Alternative%2C+Limited-Term+Certificate+of+Sierra+Club%2C+New+Jersey+Conservation+Foundation%2C+The+Sustainable+FERC+Project%2C+Natural+Resources+Defense+Council>

⁷ <https://sustainableferc.org/?s=PL18-1-NOI-PIO-Comments-FINAL>

4. IMPROVING RTO GOVERNANCE

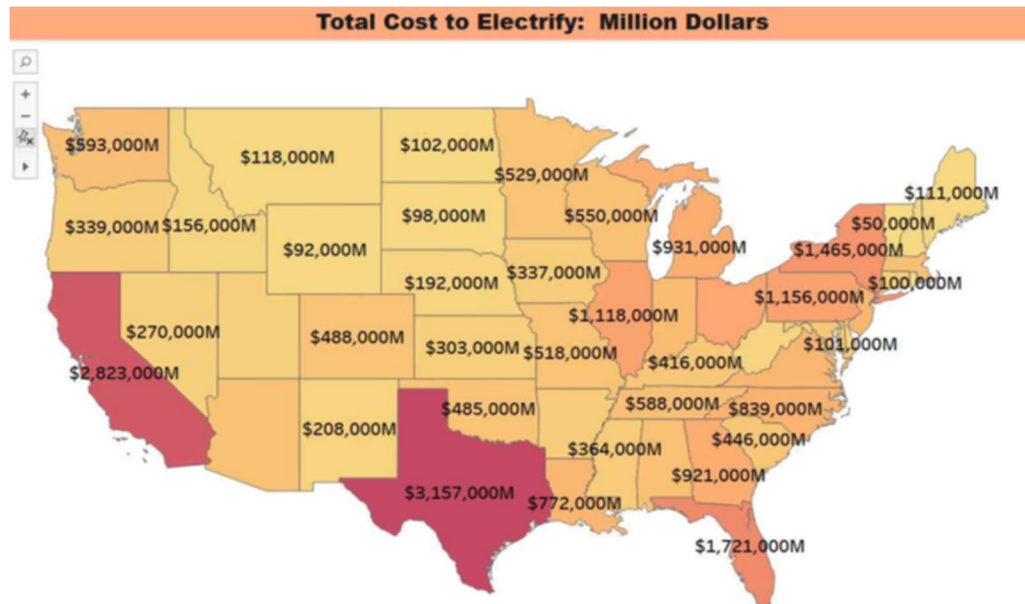
EDF's energy programs are generally aligned with NRDC's "clean (electric) energy" objectives.⁸ According to a strict dogma, clean energy is myopically limited to electric energy derived from ostensibly "carbon free" renewables. There is no legitimate/long-term role within such utopian fantasies for the direct use of natural gas except for its elimination via electrically powered appliances. Clearly, the electric utility industry stands to gain from going along with this scam; and, in fact, the NRDC and the Edison Electric Institute have signed a pact towards achieving such a future.⁹

An independent FERC has a duty to consumers to **not** let this happen. The FERC should recognize that natural gas is the leading energy alternative to electricity and should remain so to protect consumer best interests.

An additional reference germane to this docket is the following article (with excerpts) from Bloomberg: [New Gas Pipeline Development Chilled After Surprise Court Ruling¹⁰](#)

*"We're not coming in there as environmentalists" [says the "Sabin Center for Climate Change Law"]
"If FERC broadens requirements on the economic-need test, it could alter the way it balances environmental impacts on the other side of the equation."*

FERC should be questioning what such all-electric biases portend for energy consumers. Specifically, what could it mean for energy costs and emissions. I contend it will increase both. Regarding energy costs, please consider the following graphic:¹¹



⁸ <https://www.edf.org/energy>

⁹ [Warring Against Natural Gas: Joint EEI/NRDC Statement to NARUC \(crony environmentalism at work\)](#)

¹⁰ <https://news.bloomberglaw.com/environment-and-energy/court-decision-chills-development-of-new-natural-gas-pipelines>

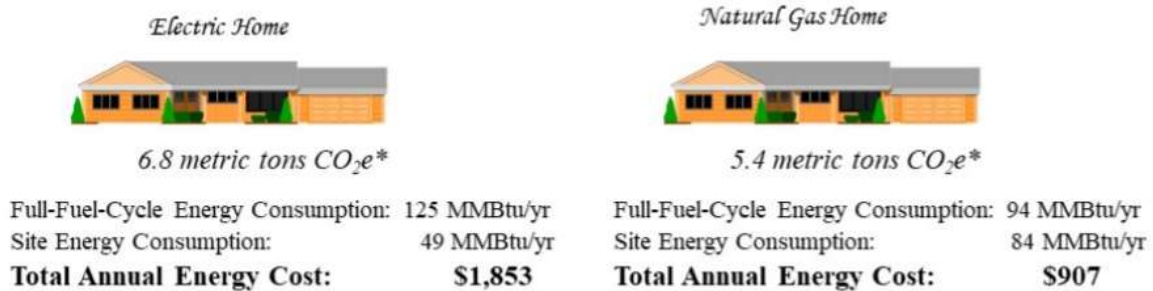
¹¹ <https://eelegal.org/policy-2/#ElectrificationReport>

Regarding emissions impacts, consider the following table of Ameren’s present generation mix extracted from the Executive Summary from their latest Integrated Resource Plan (IRP): ¹²

Coal:	69%
Nuclear:	25%
Renewables:	5%
Natural Gas:	1%
Total:	100%

For the realistically foreseeable future, switching from natural gas to electric appliances will generally increase overall emissions; be it regulated (criteria) emissions or (non-regulated) carbon emissions. Specific changes in emissions from gas to electric fuel switching are dependent upon relative appliance full-fuel-cycle emissions characteristics for a given gas to electric appliance choice. Such comparisons are outside the scope of today’s comments. However, generalized comparisons are available from the American Gas Association’s (AGA) study entitled “[A Comparison of Energy Use, Operating Costs, and Carbon Dioxide Emissions of Home Appliances.PDF](https://www.aga.org/contentassets/9cb08cba5eaa4ec9bfbddeb12634a2fd/ea-2020-04-appliance-cost-and-emissions-comparison-2020.pdf).”¹³ The following graphic is extracted from AGA’s study:

Full-Fuel-Cycle Impacts from Energy Consumption in a Typical Home



In summary and closing, this intervention is a thinly veiled attempt at increasing the market for (ostensibly renewable) electricity under the guise environmental and consumer protection. Accordingly, FERC should determine that STL Pipeline serves the legitimate interests of real consumers as opposed to the utopian pipe dreams of environmentalists that will lead to national dystopia instead.

Sincerely

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¹² <https://www.ameren.com/missouri/company/environment-and-sustainability/integrated-resource-plan>

¹³ <https://www.aga.org/contentassets/9cb08cba5eaa4ec9bfbddeb12634a2fd/ea-2020-04-appliance-cost-and-emissions-comparison-2020.pdf>

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