

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

In the Matter of a Working Case Regarding) **Case No. EW-2016-0123**
Electric Vehicle Charging Facilities)

**LACLEDE GAS COMPANY’S REQUEST TO LATE-FILE
ITS RESPONSE TO QUESTIONS FOR NATURAL GAS UTILITIES**

COMES NOW Laclede Gas Company (“Laclede”) and files this Response to questions posed by the Staff in its January 15, 2016 filing in the above referenced case, and requests that the Commission accept this Response filed after the ordered deadline. In support thereof, Laclede states as follows:

1. Although the focus of this workshop is on electric vehicles, the Staff’s January 15 Agenda for Workshop and Request for Comments included five questions for natural gas utilities. On February 1, 2016, the Commission issued an order directing that responses to Staff’s questions be filed by March 1, four weeks in advance of the workshop meeting scheduled for March 29.
2. The workshop meeting has since been moved to May 25, but the March 1 date for filing responses to Staff’s questions was not moved. Laclede states that the delay in making this filing was caused by the press of other business and requests that it be permitted to late file this Response. While Laclede is not required to file a response in this electric workshop, the Company would like to accommodate the Staff by answering its questions.
3. Given the fact that the workshop meeting has been moved to May 25, Laclede believes that no harm will accrue from the late-filing of this Response.
4. Accordingly, Laclede’s responses to the five questions posed by Staff are set forth below.

Question 1:

Does your utility own or operate compressed natural gas (CNG) facilities for vehicular use? If so, please state the number of CNG facilities, who can access them (e.g. open to the public), and if they are included as a regulated activity.

Response:

Missouri Gas Energy operates a 24-hour public CNG station located at 402 Cedar Street in St. Joseph Missouri. This station is included as a regulated activity.

Laclede Gas Company owns private slow-fill CNG facilities at its Shrewsbury, Missouri location, 4118 Shrewsbury Avenue, where it services many of the 69 CNG vehicles in its fleet. This equipment is treated as regulated. However, compression services for the gas coming into the Shrewsbury site are currently provided by Laclede Venture Corp., a non-regulated subsidiary of The Laclede Group, which owns and operates a public CNG station at that site.

Question 2:

Is your Company aware of other entities that own or operate CNG facilities in your service territory? If so, please provide an estimate of the number of CNG facilities and who can access them (e.g. open to the public).

Response:

Yes – we provide gas service to a number of public and private entities who own and operate CNG stations across our service territory. A great resource for researching alternative fuels and vehicles, including CNG station information, can be found on the Department of Energy's Alternative Fuel Data Center. (<http://www.afdc.energy.gov/fuels/>)

For Staff's convenience, the list of Missouri CNG stations has been reproduced below:

Station Name	Street Address	City	Groups With Access Code
<i>GAIN Clean Fuel</i>	<i>1400 S 2nd St</i>	<i>St. Louis</i>	<i>Public - Credit card at all times</i>
<i>Clean Energy - City of Columbia</i>	<i>1900 Lake Ridgeway Rd</i>	<i>Columbia</i>	<i>Public - Credit card at all times</i>
<i>Clean Energy - Kansas City Fleet Services Division</i>	<i>5300 Municipal Ave</i>	<i>Kansas City</i>	<i>Private - Government only</i>
<i>Republic Services</i>	<i>2115 W Bennett St</i>	<i>Springfield</i>	<i>Private</i>
<i>Missouri Gas Energy</i>	<i>402 Cedar St</i>	<i>St. Joseph</i>	<i>Public - Credit card at all times</i>
<i>Lambert-Saint Louis International Airport</i>	<i>4800 St Thomas Ln</i>	<i>Bridgeton</i>	<i>Private</i>
<i>Laclede Gas Co - Shrewsbury Facility</i>	<i>4118 Shrewsbury Ave</i>	<i>St. Louis</i>	<i>Public - Card key at all times</i>
<i>Spire Natural Gas Fueling Solutions</i>	<i>4231 Cypress Rd</i>	<i>St. Ann</i>	<i>Public - Credit card at all times</i>
<i>City of Springfield</i>	<i>1111 W Chestnut Expy</i>	<i>Springfield</i>	<i>Public - Credit card at all times</i>
<i>Clean Energy - Kansas City Fleet Services Division</i>	<i>5300 Municipal Ave</i>	<i>Kansas City</i>	<i>Public - Credit card at all times</i>
<i>Kansas City Water Services Department</i>	<i>1 NW Briarcliff Rd</i>	<i>Kansas City</i>	<i>Private - Government only</i>
<i>Lambert-Saint Louis International Airport - Super Park</i>	<i>4329 Cypress Rd</i>	<i>St. Ann</i>	<i>Private</i>
<i>Kansas City Water Services Department</i>	<i>11231 Bennington Ave</i>	<i>Kansas City</i>	<i>Private - Government only</i>
<i>Clean Energy - Lee's Summit School District</i>	<i>505 SE Transport Dr</i>	<i>Lee's Summit</i>	<i>Public - Credit card at all times</i>
<i>Clean Energy - Lee's Summit School District</i>	<i>505 SE Transport Dr</i>	<i>Lee's Summit</i>	<i>Private</i>
<i>Kansas City Water Services Department</i>	<i>1901 Brooklyn Ave</i>	<i>Kansas City</i>	<i>Private - Government only</i>
<i>Kansas City Aviation Department</i>	<i>194 Bogota St</i>	<i>Kansas City</i>	<i>Private - Government only</i>
<i>Kansas City Water Services Department</i>	<i>6109 Elmwood Ave</i>	<i>Kansas City</i>	<i>Private - Government only</i>
<i>Waste Management - St. Louis - Metro</i>	<i>220 Aurora St</i>	<i>St. Louis</i>	<i>Private - Fleet customers only</i>
<i>Kansas City Area Transportation Authority</i>	<i>1200 E 18th St</i>	<i>Kansas City</i>	<i>Private</i>
<i>Kansas City Water Services Department</i>	<i>7600 E Front St</i>	<i>Kansas City</i>	<i>Private - Government only</i>
<i>Clean Energy - City of Columbia</i>	<i>1900 Lake Ridgeway Rd</i>	<i>Columbia</i>	<i>Private</i>

Question 3:

Please state the Company's current assessment of the CNG vehicle market, including potential and likely future growth.

Response:

Natural gas offers economic and environmental advantages over gasoline and diesel vehicles. With the promise of abundant supplies at low prices, these advantages are expected to continue for many years to come. CNG is ideal for light and medium duty vehicles, and is best for return-to-base fleets or fleets/passenger vehicles that require fast-filling. While vehicle manufacturers have expanded their offerings to include NGV's, the price of these vehicles is incrementally higher due to the cost of producing or retrofitting vehicles with an EPA-certified natural gas engine or conversion system. For example, a typical pickup truck conversion can incrementally cost \$10,000 to \$12,000 more, depending on the kit and tank. Like other products in developing markets, we believe that costs will come down over time. Until then, well-crafted incentives can be helpful in promoting these cleaner burning vehicles.

Question 4:

Is the Company aware of actions that other states have done to promote the adoption of CNG vehicles? If so, please describe.

Response:

Yes. States that have the most success and growth in the natural gas vehicle market offer a variety of incentives – including incentives related to fueling stations, vehicles, fuel, excise taxes, government mandates, HOV lane status, special parking spots, and more.

Attached is a list that focuses on incentives by state just for alternative fuel vehicles. Also, please see the attached list of legislation proposed since the beginning of 2015, with bills that were passed or enacted in highlight. Please note that the Missouri legislature is considering HB 1821, which authorizes tax credits for alternative fuel vehicles, based on weight.

We have found the following two websites to be great resources for staying informed on state activities to promote the adoption of CNG vehicles.

- US Department of Energy: Laws and incentives(<http://www.afdc.energy.gov/laws>)
- Natural Gas Vehicles for America: <http://www.ngvamerica.org/government-policy/>

Question 5:

Is the Company aware of any state policies that promote or inhibit the further adoption of CNG vehicles in Missouri? If so, please describe.

Response:

We are not aware of any state policy that intentionally inhibits the adoption of CNG vehicles in Missouri.

Missouri has demonstrated a clear policy of promoting CNG vehicles. Section 142.869 of the Missouri revised statutes, passed in 2015, terminated the decal requirement for CNG vehicles and Section 142.803 also promotes CNG vehicles by reducing the tax on CNG below that of regular motor fuels. Where the regular motor fuels are taxed at \$.17 per gallon, CNG is taxed at \$.05 per gallon until 2020, and \$.11 per gallon until 2025.

See the attachment to the response to Question 4 for further proposed legislation in Missouri supporting CNG vehicles. We support transforming Missouri’s transportation outlook and suggest the State of Missouri adopt incentives for the conversion of commercial fleets to natural gas vehicles and for the construction of natural gas fueling stations. These incentives could include cash rebates and sales tax relief. Sound energy policy supports increased use of natural gas as a transportation fuel in the near, mid and long-term.

One way to give consideration to incentivize alternative fuel vehicles could be to re-activate the Missouri Alternative Fuels Commission, a group responsible for promoting the development, sale, distribution, and consumption of alternative fuels and the use of alternative fuel vehicles and technology. Provide specific direction to consider how natural gas can be utilized to reduce our dependency on foreign oil and provide increased energy security.

WHEREFORE, Laclede respectfully requests that the Commission permit Laclede to late-file this Response to the Staff's questions in this docket.

Respectfully submitted,

/s/ Rick Zucker

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