

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

In the Matter of Laclede Gas Company's ) Case No. GR-2013-0171  
Tariff to Revise Natural Gas Rate Schedules )

**MOTION TO APPROVE TARIFF FILING ON LESS THAN THIRTY DAYS'  
NOTICE AND MOTION FOR EXPEDITED TREATMENT**

**COMES NOW** Laclede Gas Company ("Laclede" or "Company"), on behalf of itself and the Office of the Public Counsel ("OPC") (hereinafter "the Joint Movants"), pursuant to 4 CSR 240-2.065(2) and (4) CSR 240-2.080(16) of the Commission's Rules of Practice and Procedure, and in support of this Motion to Approve Tariff Filing on Less than Thirty Days' Notice and Motion for Expedited Treatment, states as follows:

**Request for November 4, 2016 Effective Date**

1. Contemporaneous with the filing of this Motion, Laclede submitted to the Commission a proposed Fifth Revised Tariff Sheet No. R-56 ("Revised Tariff Sheet") which seeks to make a temporary modification to its Low-Income Energy Affordability Program (Low-Income Program). The purpose of the Revised Tariff Sheet is to revive a program previously used by Laclede to help customers maintain or restore their utility service during the upcoming winter heating season, and especially during November. For the same reasons stated herein, MGE seeks to implement a parallel program in its service territory.

2. To that end, the Revised Tariff Sheet, if approved, would reallocate up to \$400,000 of Laclede's existing Low-Income Program budget to help eligible customers<sup>1</sup> who would otherwise have to pay 80% of their arrearages to restore or maintain service. Instead of paying the full 80%, eligible customers would receive a bill credit equal to

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<sup>1</sup> Customers whose household income is less than or equal to 150% of the Federal Poverty Level.

30% of their arrearages, provided that a payment by them and/or a pledge by a participating Community Action Agency equaled 50% of their arrearages. The amount of the credit would not exceed \$400 per customer or \$800 for a registered elderly or disabled customer.

3. Similar tariff modifications have previously been approved for Laclede Gas in an effort to assist eligible customers in restoring or retaining utility service at the commencement of the winter heating season. The need for such an initiative for both the MGE and Laclede Gas operating units, however, is particularly compelling this year, given the fact that supplemental assistance under the federal Energy Crises Intervention Program (“ECIP”) will be delayed for one month. This means that low-income customers who are not registered elderly or disabled customers will have to wait until December 1, 2016 to receive ECIP assistance, while registered elderly and disabled customers will not be able to receive ECIP funding until November 1, 2016 at the earliest (as opposed to prior years when ECIP was distributed to them beginning on October 1). As a practical matter, this means that more customers with larger arrearages will be unable to have service restored since the amount of assistance available to many of them during November will be very limited compared to previous years. The tariff modification proposed herein will help to bridge that gap and in the process assist more customers in obtaining or retaining service during this period of delayed energy assistance funding.

4. It is expressly understood by the undersigned that customers participating in the program established by the Revised Tariff Sheet would continue to be eligible to participate in the Bill Payment Assistance component of the Low Income Program, that

such customers would continue to be subject to the rights and obligations afforded by the Commission's Cold Weather Rule, and that any expenditures made by Laclede for the reallocated funds shall be treated for recovery purposes in a manner identical to funds expended on the Low Income Program.

5. With this Motion, Laclede requests that the Commission permit the Revised Tariff Sheet to go into effect on less than 30 days' notice. Specifically, Laclede requests that the Commission approve the Revised Tariff Sheet effective for service on and after November 4, 2016.

6. Consistent with 4 CSR 240-2.080(16), Laclede submits that there is good cause for granting its request. The November 4, 2016 effective date will allow this effort to maintain or restore service to eligible utility customers to be implemented in a timely manner as the winter heating season progresses.

7. Laclede filed the Revised Tariff Sheet as soon as possible after the stakeholders reached an agreement on the specifics of this initiative.

WHEREFORE, for the foregoing reasons, Laclede Gas Company respectfully requests that the Commission issue its Order approving the Revised Tariff Sheet for service rendered on and after November 4, 2016.

Respectfully Submitted,

LACLEDE GAS COMPANY

**/s/ Rick Zucker**

Rick Zucker, Mo. Bar #49211  
Associate General Counsel - Regulatory  
Laclede Gas Company  
Missouri Gas Energy  
700 Market Street, 6<sup>th</sup> Floor  
St. Louis, MO 63101  
Telephone: (314) 342-0532  
Fax: (314) 421-1979  
Email: rick.zucker@spireenergy.com

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing pleading was served on the parties of record in this case on this 25th day of October, 2016 by United States mail, hand-delivery, email, or facsimile.

**/s/ Marcia Spangler**