BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Missouri Gas Energy's) Case No. GR-2014-0007 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 Missouri Gas Energy ("MGE") an operating unit of 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, MGE submitted to the Commission a proposed Original Tariff Sheet No. R-94 ("Tariff Sheet") that seeks to supplement the temporary one-time low income energy affordability program approved by the Commission in this case. The purpose of the Original Tariff Sheet is to implement a proposal to help customers maintain or restore their utility service this winter heating season.

2. To that end, the Tariff Sheet, if approved, would authorize MGE to spend and recover in its next rate case up to \$300,000 to help eligible customers¹ 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 30% of their arrearages, provided that a payment and/or pledge equal to 50% of their arrearages was

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

made on their behalf by a participating Community Action Agency. 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 would continue to be subject to the rights and obligations afforded by the Commission's Cold Weather Rule, and that any expenditures made by MGE for the

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allocated funds shall be deferred and recovered in a manner identical to funds expended on MGE's energy efficiency programs.

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

6. Consistent with 4 CSR 240-2.080(16), MGE submits that there is good cause for granting the request. The November 1, 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. MGE filed the Tariff Sheet as soon as possible after the above parties reached an agreement on the specifics of this initiative.

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

Respectfully Submitted,

LACLEDE GAS COMPANY

/s/ Rick Zucker

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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