# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Missouri Gas Energy's	)	
Tariff Filing to Implement a Joint Energy	)	File No. 2016
Efficiency Program with Independence Power	)	Tariff No. JG-2016-0136
& Light	)	

#### MOTION FOR EXPEDITED TREATMENT

COMES NOW Missouri Gas Energy, an operating unit of Laclede Gas Company ("MGE"), and, pursuant to 4 CSR 240.2.080 (14), submits this Motion for Expedited Treatment (this "Motion") for approval by the Commission. In support thereof, MGE states as follows:

- 1. This filing accompanies MGE's filing on this same date of P.S.C. MO No. 6, Original Tariff Sheets Nos 106 and 106.1 (hereafter the "Tariff Sheets'). The purpose of the Tariff Sheets is to authorize MGE to undertake a new, co-delivered pilot weatherization program with Independence Power & Light ("IPL"). Under the joint program, MGE would work with IPL to install, monitor and evaluate a suite of weatherization measures for customers who receive natural gas service from MGE and electric service from IPL. In addition to enabling such customers to reduce their energy usage from both sources, the joint effort would also allow MGE and IPL to deliver such services more efficiently than would otherwise be possible on a stand-alone basis in that it would permit them to share in the cost of identifying eligible customers, installing the weatherization measures and evaluating the effectiveness of such measures.
- 2. The specific purpose, terms and conditions of the joint program have been discussed at length with MGE's Energy Efficiency Collaborative ("EEC"), a group that includes MGE, the Staff of the Missouri Public Service Commission, the Office of the

Public Counsel, the Division of Energy and other stakeholders. The members of the EEC have endorsed the joint program and will continue to provide oversight as the program is implemented.

- 3. It is MGE's understanding that IPL wishes to commence the joint program by December 15, 2015. In order to accommodate this time schedule, and in light of the broad support among stakeholders for moving forward with the joint program, Laclede respectfully requests that the Commission approve the Tariff Sheets for service rendered on and after December 15, 2015.
- 4. There is good cause for such expedited treatment since it will permit MGE to implement its portion of the Joint Program at the same time that IPL commences its portion of the program, thereby permitting both MGE and IPL to obtain, from the outset, the maximum benefit from co-delivering the program.
- 5. MGE states that there will be no negative effect on its customers or the general public if the Commission approves this motion.
- 6. MGE has shared the Tariff Sheets and this Motion with all of the members of its Energy Efficiency Collaborative. MGE is authorized to state that neither Staff nor OPC oppose the Tariff Sheets or the Motion.
- 7. This pleading was filed as soon as it could have been following finalization of discussions with IPL, Staff, OPC and other members of the EEC.

**WHEREFORE**, for the foregoing reasons, MGE requests that the Commission issue its Order approving the P.S.C Mo. No 6, Original Tariff Sheet Nos. 106 and 106.1 with an effective date of December 15, 2015.

Respectfully Submitted,

#### **MISSOURI GAS ENERGY**

## /s/ Rick Zucker

Rick Zucker #49210
Associate General Counsel
700 Market Street, 6<sup>th</sup> Floor
St. Louis, Missouri 63101
(314) 342-0533 (Phone)
(314) 421-1979 (FAX)
rick.zucker@thelacledegroup.com

### **Certificate of Service**

I hereby certify that copies of the above and foregoing document were sent by electronic mail on this 2nd day of December, 2015 to all parties in MGE's Energy Efficiency Collaborative.

/s/	Rick	Zucker	
-----	------	--------	--