

AW-2018-0345

Promotional Practice Workshop

January 2020



Summary

Spire appreciates the efforts made by the Staff of the Public Service Commission in drafting a consolidated promotional practices rule and allotting time for discussion

Objectives of the rule:

- Level the playing field between competing fuels/technologies;
- Deter customer discrimination; and
- Prevent regulated-utilities from competing with each other through “buying load”

It is important to ensure that all parties have access to the same types of tools/protections



Program Exemptions

Staff's proposed rule appears to provide exemptions for programs that fall under the electric utilities Missouri Energy Efficiency Investment Act ("MEEIA") portfolios.

If such an exemption is included the rule, additional exemptions should be made to include all energy efficiency programs regardless of fuel source

- Maintain a level playing field

Pay As You Save ("PAYS") – Recently approved pilot – still a work in progress – however, even at the levels of this pilot, the program has the potential to induce a significant amount of fuel switching and impact other current programs (Energywise etc.) Can existing programs be expanded to be competitive?

The ability to co-deliver these types of programs should be encouraged in order to maximize the benefits to Missouri customers



Energy Efficiency Issues

Staff's proposed rule also adopts the Utility Cost Test ("UCT") as the preferred cost effectiveness test

- Contrary to where Spire was directed in our last general rate cases;
- Our tariffs specifically reference the Total Resource Cost test

Additional Program Exemptions for Consideration

Several other programs mentioned in comments that should be discussed as potential exemptions



Thank you