

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

In the Matter of the Establishment of a Working)
Case for the Review and Consideration of a Rewrite) **File No. AW-2018-0385**
of the Existing Electric and Gas Promotional)
Practices Rule Into One Rule)

SPIRE MISSOURI'S COMMENTS

COMES NOW Spire Missouri Inc. (“Spire Missouri” or “Company”), and in response to the Commission’s June 27, 2018 Order, submits these Comments, stating as follows:

1. Spire Missouri applauds the Staff’s effort to streamline the promotional practices rules and place them in one location in Chapter 10 of the Commission Rules. The Company agrees with the Staff’s concepts in jettisoning unnecessary or unused definitions, and in attempting to form one rule that could apply to both electric and gas utilities. Spire Missouri agrees with the State of Missouri’s historical approach of discouraging utilities from “buying” business through load-building programs.

2. While the proposed rule is largely a reorganization, there were a few new additions, such as the definition of ‘cost effective.’ Until recently, the parties were flexible in determining which of several cost-effectiveness tests should be used to evaluate programs in Spire Missouri’s Energy Efficiency Collaborative (“EEC”). During the 2017-18 Spire Missouri rate cases, however, the parties steered Spire Missouri’s EEC into tariffing the Total Resource Cost (“TRC”) test to determine cost-effectiveness. In addition, the Missouri Energy Efficiency Investment Act (“MEEIA”) identifies the TRC as the preferred cost effectiveness test. However, Staff’s proposed promotional practices rule appears to explicitly adopt the Utility Cost Test (“UCT”) to evaluate cost-effectiveness. Spire Missouri believes this disparity should be a matter for discussion.

3. A promotional practice workshop also creates an opportunity to discuss potential improvements to the rules. Such improvements should recognize and address some of the differences between the programs and opportunities available to gas versus electric companies. Missouri's MEEIA program for electric utilities and the recent "electrification" efforts occurring around the country are good examples of such meaningfully different programs and opportunities. Enhancements to the promotional practice rules should be implemented in a manner that levels the playing field, does not unfairly disadvantage one energy source over the other, and takes into account the full costs and impacts of utilizing such energy sources. Rule revisions should be based on comprehensive, sound policies that encourage additional co-delivery programs and other activities that will benefit Missouri customers.

4. Spire Missouri looks forward to working with Staff and other parties to the workshop on the subject of fair and balanced promotional practices.

Respectfully submitted,

SPIRE MISSOURI INC.

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