

**Laciede Gas** 7500 E 35<sup>th</sup> Terr. • Kansas City, MO • 64129

October 12, 2016

VIA EFIS Secretary Missouri Public Service Commission Governor Office Building 200 Madison Street Jefferson City, MO 65101

Re: Whole House Efficiency Program and Income Eligible Multi-Family Direct Install Program

Dear Secretary:

Enclosed for filing are substitute tariffs <u>P.S.C. MO. No. 6, Original Sheet Nos.</u> <u>107 and 107.1 and 108 and 108.</u>1 which are applicable to the Missouri Gas Energy ("MGE") Service Areas of Laclede Gas Company.

These tariff sheets are substitute tariff sheets replacing Sheet Nos. 107 and 107.1 and 108 and 108.1 included in tracking number JG-2017-0038 which have an issue date of September 1, 2016 and an effective date of October 21, 2016. The Staff of the Missouri Public Service Commission has requested some additional small changes in the tariff language which has been approved by MGE's Energy Efficiency Collaborative.

Please bring this filing to the attention of the appropriate Commission personnel.

Sincerely,

/s/Michael R. Noack Michael R. Noack <u>Original</u>

.....

Laclede Gas Company Name of Issuing Corporation or Municipality For All MGE Territory shared with KCP&L and GMO Community, Town or City

PROMOTIONAL PRACTICES PP
Income Eligible Multi-Family Direct Install Program
<b>Purpose:</b> The purpose of the Income Eligible Multi-Family Direct Install Program ("Program") is to deliver long-term energy savings and bill reductions to income-eligible customers in multi-family homes and shared common areas within the MGE service area.
<u>Administrator</u> : Kansas City Power & Light (KCP&L) will administer the program for MGE pursuant to a written contract between KCP&L and Laclede Gas Company (indicated as "Company").
<u>Availability</u> : The Program is available to income qualified multi-family properties that contain natural gas space-heating and/or water-heating equipment and receive gas service from MGE, meeting one of the following building eligibility requirements:
• Reside in federally-subsidized housing units and fall within the federal program's income guidelines. State Low-Income Housing Tax Credit buildings will be eligible only to the extent allowed under state law.
• Reside in non-subsidized housing with income levels at or below 200% of federal poverty guidelines. Where a property has a combination of qualifying tenants and non-qualifying tenants, at least 51% of the tenants must be eligible to receive incentives for the entire building to qualify. For Income-Eligible Multi-Family properties with less than 51% qualifying tenants, the building owner will be required to verify installation of comparable qualified energy efficiency measures at their expense in all non-subsidized units, at which time the Program may upgrade all remaining eligible units with qualified energy efficiency measures.
The direct-install measures will include low-flow faucet aerators, low-flow showerheads, and insulating water-heater pipe wrap, at no cost to the participant. Custom measures implemented for multi-family common areas will be rebated at an amount pre-approved by MGE based on cost/benefit analysis. Custom measures may be applied to all applicable natural gas applications such as furnace or boiler upgrades, water heating equipment upgrades for the multi-family common areas. Multi-family dwelling units are defined as structures of three (3) or more attached unit complexes. Custom measures are defined as less common measures or the integration of a number of measures to achieve significant energy savings. All custom measures must receive a pre-approval commitment from MGE before the measures are installed.
<b>Program Provisions:</b> The Company will co-deliver the Program with KCP&L and Kansas City Power & Light Greater Missouri Operations (GMO) so that eligible customers utilizing both services may receive energy savings and bill reductions from both energy sources. The Company will enter into a contract with a KCP&L to implement and maintain all services associated with the Program. This may include Contractor/Consultant recruiting, training and certification, management of the lead generation process, quality assurance, and other services contracted. KCP&L will also direct the necessary services to provide the installation of Program-specified measures noted and is responsible for oversight of the Contractor/Consultants and will also be responsible for resolving any reported customer complaints.
TE OF ISSUE September 1, 2016 DATE EFFECTIVE October 21, 2016 Month Day Year Month Day Year

 October 21, 2016

 Month
 Day
 Year

 ISSUED BY
 L. Craig Dowdy, Sr. VP, Ext. Affairs, Corp. Comm. & Mkt.,700 Market St., St. Louis, MO 63101

### P.S.C. MO. No.6

<u>Original</u>

For

Sheet No. 107.1

Laclede Gas Company

Name of Issuing Corporation or Municipality

All MGE Territory shared with KCP&L & GMO

Community, Town or City

# PROMOTIONAL PRACTICES PP **Income Eligible Multi-Family Direct Install Program Program Cost:** The total budget for each year of the Program is calculated and approved annually by the MGE Energy Efficiency Collaborative ("EEC") and may be increased or decreased per EEC decision as necessary. This amount will provide for incentive payments, marketing costs, and Company Administrative costs. Payments will be provided until the budgeted funds for the total Program are expended. **Program Funding:** The Company will fund energy efficiency programs, on an annual basis, toward the goal of .5% of the Company's gross operating revenues. These amounts will be deferred and treated as a regulatory asset with a ten-year amortization period. Such amortization will begin on the effective date of rates in the Company's next general rate case. Amounts spent under these programs will be included in MGE's rate base in its next general rate case. Each year, at the beginning of a Program Year, Company will prepare a budget of program expenditures subject to approval by the MGE Energy Efficiency Collaborative (EEC). The approved budget will be used for the ensuing 12 months unless the EEC agrees that there is a need to make changes within a budget year. MGE's expenditures will be subject to a prudence review in any relevant MPSC proceedings. Program Funding and recovery is subject to the Stipulation and Agreement in the GR-2014-0007. **Program Term:** From the effective date of the tariff to run concurrent with the KCP&L and GMO Programs. **Energy Efficiency Collaborative:** The Energy Efficiency Collaborative (EEC), which was formed in Case No. GR-2009-0355 will provide oversight for the implementation of this Whole House Efficiency Program.

DATE OF ISSUE	September 1, 2016	DATE EFFECTIVE	October 21, 2016
Veen	Month Day	•	Month Day Year
ISSUED BY	<b>v</b>	•	700 Market St., St. Louis, MO 63101

P.S.C. MO. No. 6

Laclede Gas Company

For All MGE Territory shared with KCP&L and GMO

Community, Town or City

Name of Issuing Corporation or Municipality

#### PROMOTIONAL PRACTICES PP

#### Whole House Efficiency Program

**<u>Purpose</u>:** The Whole House Efficiency Program (indicated as "Program") is designed to encourage residential customers to implement whole house improvements by promoting home energy assessments, comprehensive retrofit services and high efficiency furnaces and water heating equipment.

<u>Administrator</u>: Kansas City Power & Light (KCP&L) will administer the program for MGE pursuant to a written contract between KCP&L and Laclede Gas Company (indicated as "Company").

**Availability:** The Program is available to single family property owners and individually-metered multifamily units in buildings with 4 or less units and also renters that receive written approval from the homeowner/landlord to participate, who are MGE natural gas customers with natural gas spaceheating equipment and/or water heating equipment from the effective date of the tariff to run concurrent with the KCP&L and Kansas City Power & Light Greater Missouri Operations (GMO) Whole House Efficiency Programs. Qualifying customers will be eligible to receive the following:

**Option 1 – Home Energy Assessment:** The customer receives an in-home energy assessment and direct installation of the following measures which include Low Flow Faucet Aerators, Low Flow Showerheads, & DHW Pipe Insulation at no cost to the customer. The assessment will identify potential efficiency improvements.

**Option 2 – Weatherization Measures:** Customers who receive a comprehensive in home energy audit are eligible to receive incentives for the purchase and installation of Air Sealing, Ceiling & Wall Insulation incentives.

**Option 3 – High Efficiency Furnaces and Water Heating Equipment:** MGE will also offer incentives for qualifying high efficiency natural gas furnaces and water heating equipment measures. These measures will not be jointly delivered with KCP&L or GMO.

**Program Provisions:** The Company will co-deliver the Program with KCP&L and GMO so that eligible customers utilizing both services may receive energy savings and bill reductions from both energy sources. The Company will enter into a contract with KCP&L to implement and maintain all services associated with the Program. This may include Contractor/Consultant recruiting, training and certification, management of the lead generation process, quality assurance, and other services contracted. KCP&L will also direct the necessary services to provide the installation of Program-specified measures noted and is responsible for oversight of the Contractor/Consultants and will also be responsible for resolving any reported customer complaints not including Option 3 rebate incentives.

DATE OF ISSUE	September 1, 2016		VE October 21, 2016
	Month Day Year		Month Day Year
ISSUED BY	<b>e</b>	•	& Mkt., 720 Olive St., St. Louis, MO 63101
	Name of Officer	Title	Address

#### Sheet No. 108

<u>Original</u>

## P.S.C. MO. No. 6

.....

## <u>Original</u>

For

Laclede Gas Company Name of Issuing Corporation or Municipality All MGE Territory shared with KCP&L and GMO Community, Town or City

PROMOTIONAL PRACTICES PP			
Whole House Efficiency Program			
<b>Program Cost:</b> The total budget for each year of the Program is calculated and approved annually by the MGE Energy Efficiency Collaborative ("EEC") and may be increased or decreased per EEC decision as necessary. This amount will provide for incentive payments, marketing costs, and Company Administrative costs. Payments will be provided until the budgeted funds for the total Program are expended.			
<ul> <li>Program Funding: The Company will fund energy efficiency programs, on an annual basis, toward the goal of .5% of the Company's gross operating revenues. These amounts will be deferred and treated as a regulatory asset with a ten-year amortization period. Such amortization will begin on the effective date of rates in the Company's next general rate case. Amounts spent under these programs will be included in MGE's rate base in its next general rate case. Each year, at the beginning of a Program Year, Company will prepare a budget of program expenditures subject to approval by the MGE Energy Efficiency Collaborative (EEC). The approved budget will be used for the ensuing 12 months unless the EEC agrees that there is a need to make changes within a budget year. MGE's expenditures will be subject to a prudence review in any relevant MPSC proceedings. Program Funding and recovery is subject to the Stipulation and Agreement in the GR-2014-0007.</li> <li>Program Term: From the effective date of the tariff to run concurrent with the KCP&amp;L and GMO</li> </ul>			
Programs. Energy Efficiency Collaborative: The Energy Efficiency Collaborative (EEC), which was			
formed in Case No. GR-2009-0355 will provide oversight for the implementation of this Whole House Efficiency Program.			
DATE OF ISSUE DATE EFFECTIVE October 21, 2016			

ISSUED BY L. Craig Dowdy, Sr. VP, Ext. Affairs, Corp. Comm. & Mkt.,700 Market St., St. Louis, MO 63101

.....

Title

.....

Name of Officer