



Spire Inc.
700 Market
St. Louis, MO 63101

May 1, 2019

VIA EFIS

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

Dear Secretary,

Enclosed herewith for filing with the Missouri Public Service Commission is the revised tariff sheets, P.S.C. MO. No. 7 First Revised Sheet No. R-30.13 and P.S.C MO. No. 8 First Revised Sheet No. R-30.13 in regards to Spire Missouri Inc. d/b/a Spire (the "Company"). These revised tariff sheets, have an issue date of May 1, 2019, and an effective date of June 1, 2019, reflected by Sheet No. R-30.13 of the Company's tariff.

The Company has updated these tariff sheets to align with the Ameren Low Income Multi-Family program tariff that was recently approved for their MEEIA Cycle 3 portfolio of programs which both companies were co-delivering in MEEIA Cycle 2. The past program efforts were somewhat limited around the Custom measures focusing on only common areas which did not help drive participation. The revised program will focus on Custom measures at the tenant units, building shell, or whole building systems along with the common areas. The Company is looking to streamline Custom measures with Ameren so that both companies can get deeper energy savings with our co-delivery efforts.

Spire has provided a redlined original tariff and a clean version for review. The revised tariff changes will not increase our overall Energy Efficiency Portfolio budget for FY19. These changes will align our Company tariffs with Ameren so we can continue to serve our shared customers better moving forward.

Sincerely,
/s/ Shaylyn Dean

Shaylyn Dean

Formatted: Tab stops: 1.25", Left

Spire Missouri Inc. d/b/a/ Spire

For: Spire Missouri East

RULES AND REGULATIONS

35. Conservation and Energy Efficiency Programs (continued)

I. Multi-Family Low Income Program (the "Program")

Purpose: - The purpose of the Program is to deliver long-term natural gas savings and bill reductions to low income customers who occupy multifamily dwelling units within the Spire Missouri East service territory. This will be achieved through direct-install water consumption reduction and heat retention measures at no cost to participating customers. ~~Additional in-unit or common area measures may also be applied individually or in combination and may be eligible for incentives.~~ The Program will also provide residents of the dwelling units with education on the use of the natural gas conservation measures.

Availability: - The Program is available to income qualified multifamily properties that contain natural gas space-heating and/or water-heating equipment and receive gas service from Spire Missouri East and electric service from Ameren Missouri. ~~The direct-install measures will include programmable setback thermostats, low-flow faucet aerators, low-flow showerheads, insulating water-heater pipe wrap, furnace clean & checks. Custom measures implemented for multi-family common areas will be rebated at an amount pre-approved by Spire Missouri East 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 Spire Missouri East before the measures are installed. For the purposes of this Program the term "income qualified" refers to (i) tenant occupants residing in federally subsidized housing units who fall within that federal program's income guidelines; (ii) state low-income housing tax credit recipients to the extent allowed under state law; and (iii) residents of non-subsidized housing with income at or below 200% of the federal poverty level. For the purposes of this Program the term "income qualified" refers to:~~

Commented [DS1]: This section was moved down in a later paragraph for a better flow.

- ~~(i) Participation in federal, state, or local subsidized housing program~~
- ~~(ii) Proof of resident income levels at or below 80% of the area median income (AMI) or 200% of federal poverty level.~~
- ~~(iii) Fall within a census tract included on Company's list of eligible low-income census tracts~~

Commented [DS2]: These pieces of the Tariff have been restated in the section right below with some changes to match Ameren's Tariff filing.

Formatted: Font: (Default) Arial, 9 pt

~~Where a multi-family property does not meet one of the eligibility criteria listed above and has a combination of qualifying tenants and non-qualifying tenants, at least 50% of the tenants must be eligible for the entire property to qualify.~~

~~The intent of this Program is to install measures within income-qualified dwelling units. In properties with a combination of federally-subsidized units and non-subsidized units, at least 51% shall be federally-subsidized to receive incentives under the Program for the entire building. For multifamily properties with less than 51% federally-subsidized units, the owner or manager will be required to verify installation of comparable-qualified energy efficiency measures at their own 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 smart thermostats, programmable setback thermostats, low-flow faucet aerators, low-flow showerheads, insulating water-heater pipe wrap, furnace clean & checks. Program will provide incentives to property owners or property managers for other eligible natural gas prescriptive measures such as furnace or boiler upgrades, and water heating equipment upgrades for the multi-family property. Custom measures are defined as non-prescriptive energy efficiency measures, or the integration of a number of measures, which may include prescriptive measures, to achieve significant energy savings. All custom measures must receive a pre-approval commitment from the Program Administrator whether for tenants units, common areas, building shell, or whole building systems.~~

Program Description: - The Company will co-deliver the Program with Ameren Missouri to achieve synergies and help eligible customers receive energy savings and bill reductions from both energy sources. - The Company will enter into

an agreement with Ameren Missouri and a program administrator to develop, implement, and maintain all services associated with the Program. Measures installed pursuant to the Program ~~are not eligible for incentives for similar measures contained in any of the Company's other energy efficiency programs, except for non-incented measures for market rate or non-federally subsidized units, are not eligible for incentives for similar measures contained in any of the Company's other energy efficiency programs. Measures or non-income qualified customers not covered under this tariff may be eligible for incentives under the Company's other energy efficiency programs.~~

The Company will work with the Ameren Missouri to produce a post-implementation evaluation in order to quantify the impact of the Program. The cost-effectiveness metrics and test will be added but shall not be used to exclude or diminish low-income program, but instead shall be used to improve program delivery and effectiveness.

DATE OF ISSUE: ~~March 20, 2018~~ May 1, 2019 DATE EFFECTIVE: ~~April 19, 2018~~ June 13, 2019

ISSUED BY: ~~C. Eric Lobser, VP, Regulatory & Governmental Affairs~~ Scott A. Weitzel, Director, Rates & Regulatory Affairs

Spire Missouri Inc., St. Louis, MO. 63101

RULES AND REGULATIONS

35. Conservation and Energy Efficiency Programs (continued)

I. Multi-Family Low Income Program (the "Program")

Purpose: - The purpose of the Program is to deliver long-term natural gas savings and bill reductions to low income customers who occupy multifamily dwelling units within the Spire Missouri East service territory. This will be achieved through direct-install water consumption reduction and heat retention measures at no cost to participating customers. The Program will also provide residents of the dwelling units with education on the use of the natural gas conservation measures. The Program will have an annual budget of \$500,000.00.

Availability: - The Program is available to income qualified multifamily properties that contain natural gas space-heating and/or water-heating equipment and receive gas service from Spire Missouri East and electric service from Ameren Missouri. Multi-family dwelling units are defined as structures of three (3) or more attached unit complexes. For the purposes of this Program the term "income qualified" refers to:

- (i) Participation in federal, state, or local subsidized housing program.
- (ii) Proof of resident income levels at or below 80% of the area median income (AMI) or 200% of federal poverty level.
- (iii) Fall within a census tract included on Ameren Missouri's list of eligible low-income census tracts.

Where a multi-family property does not meet one of the eligibility criteria listed above and has a combination of qualifying tenants and non-qualifying tenants, at least 50% of the tenants must be eligible for the entire property to qualify.

The direct-install measures will include smart thermostats, programmable setback thermostats, low-flow faucet aerators, low-flow showerheads, insulating water-heater pipe wrap, furnace clean & checks. The Program will also provide incentives to property owners or property managers for other eligible natural gas measures such as furnace or boiler upgrades, and water heating equipment upgrades for the multi-family property. Custom measures are defined as less common energy efficiency measures, or the integration of a number of measures to achieve significant energy savings. All custom measures must receive a pre-approval commitment from the Program Administrator whether for tenants units, common areas, building shell, or whole building systems.

Program Description: - Spire will co-deliver the Program with Ameren Missouri to achieve synergies and help eligible customers receive energy savings and bill reductions from both energy sources. Spire will enter into an agreement with Ameren Missouri and a program administrator to develop, implement, and maintain all services associated with the Program. Measures installed pursuant to the Program are not eligible for incentives for similar measures contained in any of Spire's other energy efficiency programs. Measures or non-income qualified customers not covered under this tariff may be eligible for incentives under Spire's other energy efficiency programs.

Spire will work with the Ameren Missouri to produce a post-implementation evaluation in order to quantify the impact of the Program. The cost-effectiveness metrics and test will be added but shall not be used to exclude or diminish low-income program, but instead shall be used to improve program delivery and effectiveness.