Exhibit No.:	018
Issue:	**Storage Inventory; RSM; Rate Design; PGA; Therm Billing; Tariff Updates.**
Witness:	**Scott A. Weitzel**
Type of Exhibit:	**Surrebuttal Testimony**
Sponsoring Party:	**Laclede Gas Company (LAC) Missouri Gas Energy (MGE)**
Case Nos.	**GR-2017-0215 GR-2017-0216**
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LACLEDE GAS COMPANY
MISSOURI GAS ENERGY

GR-2017-0215
GR-2017-0216

SURREBUTTAL TESTIMONY

OF

SCOTT A. WEITZEL

NOVEMBER 2017

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SURREBUTTAL TESTIMONY OF SCOTT A. WEITZEL

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Scott A. Weitzel and my business address is 700 Market Street, St. Louis, Missouri 63101.

Q. ARE YOU THE SAME SCOTT A. WEITZEL WHO PREVIOUSLY FILED DIRECT AND REBUTTAL TESTIMONY IN THIS PROCEEDING?

A. Yes, I submitted direct and rebuttal testimony on behalf of both Laclede Gas Company ("LAC") in Case No. GR-2017-0215 and Missouri Gas Energy ("MGE") in Case No. GR-2017-0216.

I. <u>PURPOSE OF TESTIMONY</u>

Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY IN THIS PROCEEDING?

A. The purpose of my surrebuttal testimony is to respond to the issues raised and positions taken by witnesses for the Staff of the Missouri Public Service Commission ("Staff"), the Office of Public Counsel (OPC), and other parties in their rebuttal testimony. Specifically, I will respond to the testimony submitted by these parties relating to: (a) storage inventory in rate base; (b) Revenue Stabilization Mechanism ("RSM"), rate design and customer charges; (c) PGA items which include OSS and GSIP; (d) therm billing for MGE; and (e) tariffs.

II. <u>GAS STORAGE INVENTORY FINANCING COSTS</u>

Q. WHAT IS YOUR UNDERSTANDING OF STAFF'S POSITION ON NATURAL GAS AND PROPANE INVENTORIES?

A. Staff witness David Sommerer states "The preferred ratemaking treatment for gas inventory carrying costs in these proceedings should be to include them in rate base" (Sommerer Rebuttal, p. 5), rather than in gas costs, which would be consistent with the other utilities in Missouri.

Q. WHAT IS THE COMPANY'S RESPONSE TO STAFF'S POSITION?

A. Staff's position aligns with the Company's position on this matter, so Staff, LAC and MGE are in agreement. Including LAC's storage gas inventories in rate base will make LAC's treatment of these inventories consistent with MGE's, and with the other Missouri gas utilities. Staff's position is consistent with its longstanding policy of limiting the types of costs that are included in the PGA adjustment mechanism.

Q. WHAT IS YOUR UNDERSTANDING OF OPC'S POSITION ON GAS INVENTORY CARRYING COSTS?

A. OPC witness Charles Hyneman opposes including natural gas storage costs in rate base. (Hyneman Rebuttal, pp. 6-16).

Q. WHAT IS THE COMPANY'S RESPONSE TO OPC'S POSITION?

A. The Company does not support OPC's position. MGE has historically included its natural gas inventories in rate base. Staff noted that, in addition, "all other Missouri LDCs have used the 'rate base' approach to recover carrying costs associated with gas inventory in their Missouri jurisdictions" (Staff Cost of Service ("COS") Report, p. 63). MGE, Ameren, Liberty, and Empire all have storage inventory in rate base. Including LAC's storage inventory in rate base merely aligns LAC with MGE and the rest of the Missouri gas utilities. It would also provide the Company with a more consistent and less complicated way to account for these costs since the Company would be able to administer storage inventories in one manner instead of applying two different ratemaking treatments.

Q. IS LAC ASKING THE COMMISSION TO CHANGE MISSOURI POLICY ON GAS STORAGE INVENTORIES?

A. No, LAC is not proposing a change in Missouri ratemaking policy. To the contrary, in this instance, LAC is asking that it be treated the same as other Missouri gas utilities; a result that would also align it with the practices of the interstate pipelines that serve it and is also consistent with Federal Energy Regulatory Commission ("FERC") regulation. The treatment proposed by the Company for storage inventories is also consistent with the regulatory treatment afforded other inventories the Company owns, like materials and supplies, that are necessary to provide natural gas service to customers. In contrast, OPC does not explain why maintaining gas storage inventories in rate base is acceptable for every Missouri gas utility but LAC.

Q. IS OPC CORRECT THAT INCLUDING INVENTORY IN RATE BASE WILL INCREASE RATES BY $7 MILLION?

A. No, this would simply be returning gas inventory costs to where it is included for all other utilities. Nor is the amount calculated by Hyneman in his analysis necessarily correct or complete.

Q. WHY IS THAT?

A. First, Mr. Hyneman calculated the difference using the Company's proposed return on rate base rather than the much lower rate of return proposed by OPC's own witness, Mr. Gorman. Second, the difference between return on rate base and the short-term debt rate which Mr. Hyneman's analysis assumes will remain constant is, instead, likely to fluctuate between rate cases. If the difference between the two rates narrows, so will the monetary difference between the two treatments. Finally, rate-basing these inventories locks them in at the current cost of gas. Today, LAC can adjust for the cost of gas in the PGA. In rate-basing these costs, any increase in the cost of gas or the cost of debt would not be recovered in rates, so LAC, like MGE, would be at risk for such changes.

Q. AT PAGE 14 OF HIS REBUTTAL TESTIMONY, OPC WITNESS HYNEMAN ARGUES THAT GAS INVENTORY FINANCING COSTS ARE A "PURE, CLEAR AND IDENTIFIABLE COST OF NATURAL GAS." IS THAT ARGUMENT CONSISTENT WITH PREVIOUS OPC POSITIONS?

A. No. OPC argues here that gas financing costs are a gas cost, but in Case No.GT-2009-0026, OPC argued that the gas cost portion of bad debt is not a gas cost. When the Company bills its customers, part of the bill is for distribution cost and part of the bill is for gas cost. When the customer does not pay the bill, the Company experiences distribution cost bad debt and gas cost bad debt, yet OPC argued, and the Commission agreed, that the gas cost included in bad debt was not a gas cost.

Q. WHAT DID STAFF ARGUE IN CASE NO. GT-2009-0026?

A. In that case, Staff argued that the gas cost portion of bad debt is not a gas cost. Staff witness Sommerer's position in this case is consistent with Staff's earlier position in Case No. GT-2009-0026 and, as stated above, consistent with Staff's long-standing policy to limit the types of costs recovered through the PGA. Conversely, OPC's position is inconsistent with its prior position.

III. REVENUE STABILIZATION MECHANISM (RSM)

A. STATUTE

Q. STAFF WITNESS STAHLMAN CLAIMS THAT SPIRE'S RSM PROPOSAL DOES NOT QUALIFY UNDER RSMO 386.266.3 ("THE STATUTE"). DO YOU AGREE?

A. No. I do not. Staff witness Stahlman claims that the proposed RSM is not authorized under the Statute as it would not only adjust for weather and conservation, as prescribed by the Statute, but would also be impacted by additional factors such as fuel switching, rate switching, new customers with non-average usage, and economic factors, due to the average use-per-customer construct used in the RSM.[1] As Staff itself has recognized, however, the overwhelming majority of the variation in average use per customer is due to weather. The only other consistently meaningful variation is caused by conservation. While the other items can be both positive or negative adjustments in a manner similar to weather, they are much smaller in scale and so can be considered immaterial. Therefore, the RSM's adjustment for differences in average use is, for all intents and purposes, due entirely to changes in weather and

[1] Staff witness Stahlman Rebuttal Testimony, p. 6

conservation. The other items identified by Staff witness Stahlman are so miniscule relative to the customer base as to be virtually non-existent. In essence, Mr. Stahlman's concerns pale in comparison to the significant benefits the RSM provides.

Q. WILL YOU PLEASE EXPLAIN IN GREATER DETAIL WHY YOU BELIEVE THE POTENTIAL IMPACTS CITED BY MR. WITNESS STAHLMAN ARE SO IMMATERIAL?

A. Yes. First, based on the Company's historical experience of very limited customer growth, it is unreasonable to assume that the Company would add a number of customers between now and the Company's next rate cases that is significant enough to move the average use per customer in any material way. It is further highly unlikely that the majority of additional customers will be low usage customers since approximately 95% of new additions in LAC and MGE are single family homes. It is just as likely, or more likely, that customer additions will tend to be above average use customers, which under the RSM would actually be a very slight detriment to the Company, assuming it had any perceptible impact at all. In any event, to the extent there are additional low usage customers, they should be more than offset by additions of higher use customers. In the end, when added to a customer base of residential and small commercial customers of over 600,000 in eastern Missouri, and nearly 500,000 in western Missouri, there is little chance that net customer growth within the historic norms of a few thousand a year would even have a rounding impact on the overall average use per customer.

Q. CAN YOU FURTHER ILLUSTRATE THIS IMMATERIAL EFFECT?

A. To illustrate the immaterial impact of these other factors, assume that all the new residential customer actually added by the Company in 2017 had usage that was 10% below the average usage then being experienced. Even under such an implausible assumption, LAC's residential average usage of 806 therms would be reduced to 805.7 therms, or less than a third of a therm. Please see Schedule SAW-S1. As previously noted, however, many customers will likely have usage that is above the average so even this miniscule impact would not occur.

Q. ARE THE IMPACTS ON AVERAGE USAGE FROM THE OTHER FACTORS CITED BY MR. STALHMAN EQUALLY IMMATERIAL?

A. Yes. The number of customers in the residential and small commercial class that switch fuel during the period between rate cases is minimal. Moreover, fuel switching can result in either losing or adding appliances, which will also tend to cancel out any small usage impacts. Moreover, to the extent that switching results in the loss or gain of the entire customer, not just their level of consumption, such customer changes are not adjusted for by the RSM. Additionally, fuel switching is much more likely for large customers for whom energy prices are a significant operating expense. The Company is not proposing that such customers be included in the RSM. Since the statute applies to all commercial customers, the Company's willingness to omit the larger commercial customers from the adjustment mechanism makes the proposed RSM more modest in scope. Finally, with the simplification and reduction in rate classes, the very limited amount of class switching that could occur becomes even less likely and again would go both ways.

Q. STAFF WITNESS STAHLMAN RAISES A DISTINCTION BETWEEN ENERGY EFFICIENCY AND CONSERVATION, IMPLYING THAT THE LEGISLATION DOES NOT APPLY TO CONSERVATION ACHIEVED THROUGH TECHNOLOGY. WOULD YOU CARE TO COMMENT[2]?

A. Yes. As Staff witness Stahlman notes, the term 'conservation' is not defined in the statute. The normal definition of 'conserve,' according to Merriam-Webster, is to "avoid the wasteful use of." It does not distinguish such avoidance based on whether or not technology is used; whether behaviors are modified to reduce unnecessary consumption of energy, or whether insulation is added to reduce loss of energy. But even using the EIA's definition in Mr. Stahlman's testimony supports the interpretation that conservation includes energy efficiency, because 'energy conservation' is defined as "any behavior[3] that results in the use of less energy." Thus, energy efficiency is properly characterized as an element under the larger umbrella of "conservation" that is referenced in the statute.

Q. ON PAGE 8 OF STAFF WITNESS STAHLMAN'S REBUTTAL TESTIMONY, HE CLAIMS THAT CUSTOMERS CAN USE BUDGET BILLING TO STABILIZE THEIR BILLS, AND THAT THE RSM CAN CAUSE LESS STABILITY. HOW DO YOU RESPOND?

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[2] Staff witness Stahlman rebuttal testimony at p. 7

[3] Choosing to implement energy efficiency measures or purchase energy efficient appliances is a "behavior"

A. We do recommend budget billing to our customers as a means to smooth out their bills, but as we saw at local public hearings, some customers do not prefer budget billing for various reasons, including not liking a high bill in the summer when usage is low. In fact, the percentage of customers who opt for budget billing has remained below a third of the Company's customers over the years. In addition, budget billing would not prevent customers from overpaying the Company in cold winters, or help the Company avoid being underpaid in warm winters. The stability provided by the RSM is that, regardless of the vagaries of weather, customers can count on paying the Company only the revenues it was designed to receive for its distribution operations, relieving customers of the risk that they will overpay the Company when increased usage in a cold winter combines with higher gas prices caused by higher demand to significantly increase bills.

Q. ON PAGE 9 OF HIS REBUTTAL TESTIMONY, MR. STAHLMAN WORRIES THAT THE RSM WILL REMOVE A CUSTOMER'S ABILITY TO CONTROL THEIR OWN BILLS BECAUSE THEIR FINAL BILL WILL INCLUDE A RATE THAT IS A FUNCTION OF OTHER CUSTOMERS' USAGE. DO YOU AGREE?

A. No, I do not. Residential customers, for example, all have the same rate for their gas usage. Therefore, each customer's bills have always been based on all customers' usage. In the past, MGE and its customers avoided the risks associated with weather through a fixed monthly customer charge that recovered all of MGE's distribution revenues– so customers had no control over this portion of their bill. This stabilized customers' bills but provided them with less incentive to conserve. The RSM permits the Company and the customers to reduce the impact of weather on what they collect or pay for service, but makes the Company much more flexible in accepting rate designs that can accomplish various goals, including promoting the very conservation that the RSM covers. Thus, the RSM increases the incentive for customers to conserve, and results in customers having more control over their own bills, not less.

Q. OPC HAS LABELED THE RSM PROPOSAL AS SINGLE-ISSUE RATEMAKING. DO YOU AGREE?

A. No. The Company's RSM has been characterized as single-issue ratemaking by OPC witness Dr. Marke.[4] However, it should be acknowledged that this proposal is being made in the context of a general rate case and is, more importantly, entirely authorized by the statute. The legislature has deemed this type of mechanism a reasonable tool for gas utilities to implement to better serve customers and the Company has complied with the enabling statute. Therefore, there is no reason this characterization should prevent the RSM from being implemented in this proceeding any more than similar characterizations have stood in the way of making other rate changes the legislature has authorized to be made outside a rate case, including, for example, ISRS and fuel adjustment charges.

[4] OPC witness Marke rebuttal testimony at p. 4

B. RECOGNITION OF DECOUPLING BY OTHER STATES, COMMISSIONS, AND ORGANIZATIONS

Q. HAVE OTHER JURISDICTIONS AND COMMISSIONS IMPLEMENTED MECHANISMS SIMILAR TO THE COMPANY'S PROPOSED RSM?

A. Yes, mechanisms that remove the so-called "throughput incentive" have been increasingly recognized as a valuable tool for utilities and commissions across the country. In addition to being implemented in an increasing number of states, these types of mechanisms have been recognized by several other national organizations and energy stakeholders including the National Housing Trust, the National Resource Defense Council and the American Council for an Energy Efficient Economy Project,[5] as well as by Missouri stakeholders such as Renew Missouri and the Division of Energy.[6] By eliminating the throughput incentive, utilities have more flexibility to engage in promoting energy efficiency without self-inflicting financial harm, and to implement additional, unique changes that better serve customers, such as the Companies' proposal to reduce customer charges.

Q. TO WHAT EXTENT HAVE OTHER UTILITY JURISDICTIONS AND REGULATORY COMMISSIONS IMPLEMENTED MECHANISMS SIMILAR TO THE PROPOSED RSM?

A. The attached presentation from the American Gas Association illustrates that these types of mechanisms are now used in many jurisdictions across the country.

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[5] https://www.nrdc.org/resources/gas-and-electric-decoupling, https://aceee.org/topics/decoupling-utility-profits-sales,

[6] See Company witness Weitzel rebuttal testimony at p. 15

As of December 2016, 41 states had approved mechanisms that would create similar treatment. This included 58 utilities with approved decoupling mechanisms in 23 states, six with mechanisms pending and nine states with Rate Stabilization mechanisms. Additionally, nine states have approved SFV rate designs, which, as described below, provide similar results in terms of utility revenue recovery as an RSM, but with the kind of impacts on low-use customers that OPC has sought to avoid in the past. As observed by OPC witness Marke, MGE had an SFV rate until 2014, when, at OPC's request, the Company agreed to a reduction in the fixed monthly charge. As stated above, the Company's reduced customer charges coupled with the RSM serve to mitigate the bill impacts to low-use, low-income customers.

Q. DO UTILITIES COMMONLY PROPOSE TO REDUCE THEIR CUSTOMER CHARGES?

A. No. In fact, this type of proposal is not only seldom seen in the current energy operating environment, but runs counter to the treatment of this bill component typically proposed in virtually all utility rate proceedings in recent history, including cases in Missouri. In fact, treatment of customer charges can often be one of the most disputed issues in a utility rate proceeding. This is due to the impact of higher customer charges on low- and fixed-income customers that can, in some instances, be substantial. In many public hearings associated with these cases, the Company heard numerous customers testify regarding what they viewed as the undesirable impact of higher fixed customer charges on low- and fixed- income customers. The RSM eliminates the need for the utility to recover necessary revenues through a higher customer charge and allows both MGE and LAC to make a novel proposal to reduce their fixed monthly charges consistent with the views expressed by these customers.

C. SIMPLIFIED APPROACH

Q. IN THE EVENT THE COMMISSION DOES NOT APPROVE THE COMPANIES' RSM PROPOSAL, WHAT IS THE COMPANY'S ALTERNATIVE RATE DESIGN PROPOSAL?

A. As described in prior direct and rebuttal testimony, in the event the Commission does not approve the RSM, LAC and MGE propose increasing the customer charges for residential and small commercial customers and implementing a weather mitigated rate design for both utilities, similar to that currently in place for LAC.

Q. PLEASE FURTHER EXPLAIN THE WEATHER MITIGATION RATE DESIGN.

A. As currently employed by LAC, a weather mitigation rate design recovers embedded average costs through a fixed customer charge and a first block consisting of a high variable rate applied to a limited number of therms or ccfs. During the winter billing months, LAC recovers its distribution cost of service through a fixed customer charge and up to 30 therms of usage, after which, there is no distribution charge for additional therm usage. A corresponding offset is made in the first block of the PGA to reduce the impact on low use customers of recovering these distribution costs primarily in the customer charge and first block. The Company has proposed eliminating this rate design for LAC in this proceeding to provide greater consistency between the Spire Missouri operating units and due to its complexity when compared to the flat per ccf rate design of MGE. As described by OPC witness Marke,[7] a weather mitigated rate design operates in a similar fashion during the winter months as an SFV rate design. This limits the ability of customers to control bills through conservation and impacts low income customers disproportionately. The Company's proposed RSM would be similar to the current weather mitigated rate design only in that it helps prevent over-recovery while better ensuring recovery of the Company's Commission approved revenues. At the same time, it would do so in a fashion that is much simpler and that further mitigates the impact on low-use and low-income customers through a corresponding reduction in customer charges.

Q. OPC WITNESS MARKE STATES THAT A STRAIGHT-FIXED VARIABLE RATE DESIGN SENDS CUSTOMERS A PRICE SIGNAL THAT ENCOURAGES CONSUMPTION, DO YOU AGREE?

A. To an extent, price signals inform customers of the cost of the product or service they are purchasing or consuming, they can provide either an incentive or disincentive to consume additional units of that product/service. However, because the commodity cost of natural gas makes up about 50% or more of the bill, even with an SFV rate design, signals to conserve still exist. Natural gas distribution is largely a fixed cost business. It is not uncommon for fixed cost businesses to recover the costs of providing service through a fixed charge (i.e.

[7] See Rebuttal Testimony of OPC witness Marke at p. 6

cable, cell phone). The dislike for a high customer charge was expressed at every one of our local public hearings. Adoption of the Company's RSM proposal and corresponding reduction in customer charges, however, would permit these fixed costs to be recovered (but not over-recovered) through a volumetric adjustment while at the same time putting more of the recovery of the fixed costs on the volumetric charge. By doing so, such an approach would advance OPC's apparent goal of providing a price signal that further encourages customers to reduce rather than increase their usage of natural gas. Accordingly, OPC should be supporting the RSM, not opposing it.

Q. DOES THE RSM ENABLE ANY OTHER SIMPLIFICATION BENEFITS?

A. Yes, it should be noted that the RSM works in a symmetrical fashion. The mechanism will recover Commission-approved revenue, no more and no less. In instances when revenues exceed the Commission authorized revenues, customers would receive an RSM credit. In instances where revenues fall short of recovering Commission-approved revenues, customers will receive an RSM charge. In this way, the mechanism would provide customers the benefit of greater bill stability while stabilizing utility revenues, all without the need for customers to take any additional action.

D. RISK

Q. ON PAGE 8 OF HIS REBUTTAL TESTIMONY, OPC WITNESS MARKE STATES THAT AN RSM SHIFTS RISKS TO RATEPAYERS, ENSURES COMPANY PROFITS AND, IF APPROVED, SHOULD BE

ACCOMPANIED BY AN EXPLICIT ROE REDUCTION. DOES THE RSM SHIFT RISK FROM SHAREHOLDERS TO CUSTOMERS?

A. No, it does not. If you assume that rates are set based on perfectly accurate predictions of weather and usage, then the Company and the customer share equal risk that a particular year will result in an overcharge or undercharge of revenues. However, as noted above, the Company already has in place rate designs at both LAC and MGE that eliminate a significant portion of the risk Dr. Marke talks about. Additionally, as also noted, nearly all the peers in the industry have some form of decoupling in place, so the relative risk would become more in line with the peer group that returns are based upon were the RSM approved. In contrast, the failure to approve the RSM would create a higher level of risk to the Company than its peers, would mean adoption or continuation of a less customer-friendly, more complicated rate design, and would result in a misalignment of the interests of the Company and its customer in pursuing energy conservation efforts. I am at a loss to understand how such a result would benefit anyone.

Q. WOULD THE COMPANY FACE ADDITIONAL RISKS EVEN WITH AN RSM MECHANISM IN PLACE?

A. Yes, the RSM would only apply to the Residential and Small General Service rate schedules. The revenues associated with the large customer classes would not be subject to the RSM. Residential, and to a lesser extent, Small General Service customers have less flexibility in the way they use gas service. A typical residential customer uses gas for a limited number of daily functions. Larger customers are much more subject to the effects of economic cycles and can ramp operations, and thus usage, up and down accordingly. The RSM does not address this revenue risk or others such as those resulting from customer losses.

Q. DOES THE RSM ENSURE RECOVERY OF COMPANY PROFITS IRRESPECTIVE OF MARKET CONDITIONS OR INEFFICIENT UTILITY BEHAVIOR?

A. No, Dr. Marke is simply incorrect on this point. The RSM only addresses revenues. It does not cover the cost side of the equation. Since profits equal revenues minus costs, the RSM cannot possibly ensure profits. In other words if revenues are level, but costs rise, whether due to inflation, unexpected events, or the "inefficient utility behavior" cited by Dr. Marke, the Company's profits will decline.

Q. SHOULD THE COMMISSION REDUCE THE COMPANY'S ROE IF IT APPROVES THE RSM?

A. As noted above, if the Commission approves the Company's RSM proposal, the Commission should grant an ROE that is commensurate with the other utilities that also have a decoupling mechanism. Only if it does not approve the RSM should the Commission adjust ROE and, for the reasons suggested by other Company witnesses, such an adjustment should be an upward one.

IV. RATE DESIGN

Q. WHAT IS STAFF'S POSITION ON THE INTERIM RATES THE COMPANY IS PROPOSING TO BECOME EFFECTIVE IN MARCH 2018 AND THEN CHANGING IN OCTOBER 2018?

A. Staff does not propose a transition period from the time rates take effect in March 2018 until October 2018, because it states that it is not aware of a good reason to delay implementation of ongoing rates. Staff has, however, proposed a shift of cost recovery to volumetric rates going into a low-use period – something that would significantly impact the Company's ability to recover it costs absent transition rates, such as those that were put in place when MGE shifted from its SFV rate design to a more volumetric approach in its last rate case. (Rebuttal Testimony of R. Kliethermes, p.8).

Q. HOW AND WHY WOULD THESE TRANSITION RATES BE IMPLEMENTED?

A. The Company is proposing to maintain each operating unit's current fixed monthly charges (which include both the customer charge and current ISRS charges) the same until October 1, 2017. This would translate into an initial customer charge of $25.50 for MGE and $23.50 for LAC. Effective October 1st these fixed charges would be reduced and a corresponding, revenue neutral increase made to the volumetric charge. Because the interim March to October period is a period of low usage, the Company would lose millions of dollars in revenue if it instead reduced these fixed charges and increased volumetric charges in March. In effect, the Company is trying to balance the seasonality of its business while implementing an improved rate design in a way that does not indiscriminately harm the Company. Again, I should note that this same kind of approach was agreed upon by the parties and approved by the Commission in MGE's last rate case proceeding for the same reasons.

Q. DOES THE COMPANY AGREE WITH STAFF'S CORRECTION TO THEIR CLASS COST OF SERVICE STUDY FOR LAC?

A. No. The effect of Staff's correction was to allocate storage expense to basic transportation customers.

Q. DOES THE BASIC TRANSPORTATION CLASS UTILIZE COMPANY OWNED STORAGE?

A. No. Transportation customers provide their own natural gas supply through third-parties or marketers. Under the transportation class, the Company is responsible for distribution and balancing only, not gas supply.

Q. DO YOU THINK THE WINTER BILL AT PROPOSED RATE DESIGNS REFLECTED ON THE CHART ON PAGE 7 OF MS. R. KLEITHERMES' REBUTTAL TESTIMONY IS A FAIR REPRESENTATION?

A. No, this shows an apples and oranges comparison. The Company and Staff have a wide variance on revenue requirements which drives the rate impact. This simply shows that Staff and the Company are far apart on revenue requirements. Company witness Tim Lyons addressed this on page 33 of his rebuttal testimony. If Staff wanted to show a realistic winter bill impact they should have picked a single revenue requirement number to be used by "Staff Proposed" and "Company Proposed".

Q. PLEASE DESCRIBE OPC WITNESS MARKE'S COMMENTS ON CUSTOMER CHARGES. DO YOU HAVE ANY COMMENT?

A. OPC witness Dr. Marke recommends a $14.00 customer charge for both Laclede and MGE. Dr. Marke does give positive recognition to the Company's proposal to lower its customer charges to allow customers, and especially low income, low usage customers, greater control over their utility bills (Marke Rebuttal, p.12). But then Dr. Marke responds these efforts by proposing a significant reduction in existing customer charges that is substantially below those currently in effect for LAC and MGE and more than 20% below the average customer charge of $17.84 for gas utilities in Missouri. Please see Schedule SAW-S2. Dr. Marke makes this recommendation even though OPC did not even complete a class cost of service model. Moreover, he does so while also opposing an RSM that would help manage the significant addition to variability he would introduce to customers' bills and the level of revenues received by the Company. His recommendation should be rejected by the Commission.

V. PGA

Q. WHAT IS THE COMPANY'S POSITION ON THE STAFF PROPOSAL ON OFF-SYSTEM SALES AND CAPACITY RELEASE ("OSS/CR")?

A. As I stated at page 9 of my rebuttal testimony, the Company agrees with Staff's recommendations on this issue.

Q. WHAT IS YOUR UNDERSTANDING OF STAFF'S PROPOSAL RELATED TO LAC'S GAS SUPPLY INCENTIVE PLAN ("GSIP")?

A. Staff recommends eliminating the GSIP (Crowe Rebuttal p.7). The Company has addressed the issue in my rate design rebuttal testimony, page 6.

Q. DOES THE COMPANY HAVE ANY FURTHER RESPONSE TO THIS RECOMMENDATION?

A. We continue to disagree with it. The gas market has fundamentally changed since the creation of the GSIP. The Company believes the GSIP needs to be modified to be better aligned to the gas market and current price levels and expanded to MGE.

Q. DO YOU HAVE ANYTHING TO ADD TO YOUR REBUTTAL TESTIMONY ON GSIP?

A. Yes. Staff and others have raised the concern that there is too much uncertainty regarding the Company's future gas supply portfolio. It is public information that LAC plans to procure capacity on Spire STL Pipeline to add greater pipeline supplier diversity and access the prolific Marcellus shale formation. To address the concerns that have been raised regarding the potential impact of this new supply source on the supply cost benchmark used in the GISP, the Company agrees to add this language to the GSIP tariff.

The Company shall promptly notify Staff and OPC if and when it adds or changes pipeline capacity of a quantity equal to or greater than 10% of its existing capacity, and shall work with OPC and Staff to set a new GSIP benchmark.

In addition, the Company is open to discussing whether the new pipeline discount feature of its proposed GSIP should be maintained, although we have already structured it in a way that would not be applicable to the Spire STL Pipeline arrangement.

VI. BILLING UNITS (THERM VS. CCF)

Q. WHAT IS YOUR UNDERSTANDING OF STAFF'S RESPONSE RELATED TO MGE CONVERTING ITS BILLING MEASUREMENT FROM CCF TO THERMS BY APPLYING A BTU FACTOR?

A. Staff witness Beck recommends that the Commission reject the Company's proposal in this case for MGE to switch to therms. As I discuss below, I believe that Mr. Beck's concern are either based on a misunderstanding of the Company's proposal or can be remedied in a manner that should permit the conversion to proceed.

Q. **DOES THE COMPANY AGREE WITH MR. BECK THAT A GOOD CUSTOMER EDUCATION PROGRAM SHOULD ACCOMPANY SUCH A CHANGE?**

A. Yes. The Company would add a bill message or create an insert for customer bills to explain this change. We also intend to post educational materials on MGE's website relating to the conversion to therm billing. Please see Schedule SAW-S3 for an example of a communication from Berkshire Gas relating to its own CCF-to-Therm conversion initiative. MGE would provide similar information and would work with Staff on the contents of that education piece.

Q. **MR. BECK ASSUMES THAT THE COMPANY WOULD PERFORM CONVERSIONS ON AN INDIVIDUAL CUSTOMER BASIS (BECK REBUTTAL, P. 3). IS THIS HOW THE COMPANY PLANS TO CALCULATE THE BTU CONVERSION?**

A. No. The Company agrees with Mr. Beck that it does not seem logical to have the conversions done on an individual customer basis. Instead, MGE proposes to use the same conversion factor for all customers based on a weighted average of all the pipeline supply sources serving the Company's customers.

Q. HOW DOES THE COMPANY PLAN TO CALCULATE THE BTU CONTENT FOR MGE CUSTOMERS?

A. MGE is primarily supplied by Southern Star Central Gas Pipeline, which provides about 84% of its needs based on peak day pipeline capacity design. Tallgrass Interstate Gas Transmission accounts for approximately 12% of pipeline capacity. Panhandle Eastern Pipeline accounts for approximately 3% and Rockies Express Pipeline accounts for roughly 1%. MGE would take the daily average BTU content at these different pipelines take points and weight them based on the 84%, 12%, 3%, and 1% pipeline allocations described above. This averaged BTU factor would then be used for all MGE customers.

Q. ON PAGE 5 OF MR. BECK'S REBUTTAL TESTIMONY, HE STATES THAT STAFF WAS TOLD THAT THE SYSTEM COULD NOT BE PUT IN PLACE BY THE OPERATION OF LAW DATE. DO YOU AGREE WITH THIS STATEMENT?

A. No. There seems to be some misunderstanding on this matter. LAC and MGE use the same billing system. LAC customers are currently billed in therms based on a BTU content. MGE would be able to simply use the same processes that are currently designed in the Company's billing system to handle a BTU factor and create therms on MGE's bills. Given these considerations, the Company can put in place and input BTU factors for therm billing in the system by the Operation of Law Date in these cases.

Q. DOES THE COMPANY CURRENTLY TRACK BTU FACTORS FOR THE MGE SERVICE TERRITORY?

A. Yes. As part of the MGE's transportation cashout billing procedure, MGE inputs BTU factors into the billing system. Please see Schedule SAW-S4.

Q. DOES THE COMPANY HAVE CONCERNS ABOUT MR. BECK'S REBUTTAL TESTIMONY ON PAGE 5 THAT COMPARES LAC'S BTU FACTORS AND THE NATIONAL AVERAGE BTU FACTORS TO MGE'S?

A. Yes. The Company has used 1.02 BTU as a preliminary estimate for MGE's service territory for various analyses. Mr. Beck compares the 1.02 factor to LAC's BTU factors which are tied to completely different pipelines, with the majority of them coming from different supply basins that have different heat content. Mr. Beck then states the national average as a reference at 1.037. BTU factors, however are specific to pipelines and regions and will vary depending on supply sources. The Company is proposing to have therm billing so that heat content can be measured at local interconnects to the MGE system, just as is done for LAC. This will give a more precise and true value of usage. It is therefore not accurate or appropriate to use LAC's BTU factor and the national average BTU factor to try to gauge MGE's BTU factor.

VII. <u>TARIFFS</u>

Q. HAVE ANY OF THE PARTIES IN THESE CASES COMMENTED ON TARIFF CHANGES IN REBUTTAL?

A. Yes, Staff witnesses Kliethermes, Gateley, and Stahlman provided rebuttal testimony on certain tariff issues. OPC witnesses Marke and Mantle also provided rebuttal testimony on these issues.

Q. WHAT TARIFF ITEMS ARE THESE PARTIES ADDRESSING?

A. Staff addressed those portions of the Company's proposed tariffs relating to: Maps and description of service territory, Low Income Energy Affordability, miscellaneous tariff changes, Economic Development Rider ("EDR"), Special Contracts, Main Extension financing, Customer Definition, Red Tag Program, Insulation Financing Program, and EnergyWise. OPC addressed those provisions of the Company's proposed tariffs relating to: Customer Confidentiality, Main Extension financing, EDR, Special Contracts and Low Income Affordability Programs.

Q. WHAT HAVE YOU SUBMITTED IN RATE DESIGN REBUTTAL ON THESE MATTERS?

A. Among other items, I explained the Company's position on whether maps and detailed legal descriptions of our service territory should be included in our tariff (Weitzel rate design rebuttal, p.3), discussed the Company's proposed Low Income Energy Affordability Programs (Weitzel rate design rebuttal p.10) and attached revisions to the Low Income Energy Affordability tariffs to my rebuttal testimony. (Schedule SAW-R1). I would refer the Commission to that earlier testimony as my response to what Staff and OPC have said in their rebuttal testimony as well as to the revised tariffs that I have attached to my surrebuttal testimony in an effort to address some of the issues raised in that testimony. I should note that this is a work in progress and additional changes may be made as the proceeding progresses.

Q. DO YOU AGREE THAT THE CURRENT FUNDING LEVEL FOR LAC'S LOW INCOME ENERGY AFFORDABILITY PROGRAM IS $950,000 (R. KLEITHERMES P.13)?

A. No. The current funding level for LAC is $600,000. This can be found on LAC's tariff sheet R-53.

Q. STAFF HAS EXPRESSED A CONCERN ABOUT THE 10% ADMINISTRATIVE FEE THAT THE COMPANY IS PROPOSING TO PAY COMMUNITY ACTION AGENCIES TO ADMINISTER ITS LOW-INCOME ENERGY AFFORDABILITY PROGRAM. IS THIS A VALID CONCERN?

A. No, I don't believe it is. The proposed fee is consistent with the allowance for administrative costs that has historically been provided in the program. Moreover, while we are proposing to simplify the program as Staff notes, we will also be asking the agencies to devote more resources to identifying customers who have will have a better chance to succeed under the program and to help them do so. In light of this consideration, we believe maintaining this allowance at the proposed level is appropriate.

Q. IN RESPONSE TO THIS TESTIMOY, WHAT IS THE COMPANY SUBMITTING IN SCHEDULE SAW-S5 IN REGARD TO ITS PROPOSED TARIFFS.

A. After reviewing their rebuttal testimony and receiving additional input from the parties, I am suggesting additional changes to our proposed tariffs as part of schedule SAW-S5. These tariffs include those applicable to: Low Income Energy

Affordability, Conservation and Energy Efficiency Programs, Economic Development Rider, Special Contract Rider, and financing for the extension of distribution facilities. The Company also agrees to remove customer confidentiality language from its proposed tariffs as recommended by OPC.

Q. DO YOU AGREE WITH MS. MANTLE THAT THE RED-TAG PROGRAM HAS HAD VERY LIMITED SUCCESS?

A. I agree that the red-tag program is a modest program of limited means, and that it has been successful. So in that sense I believe it has been a limited success. I would also note that Ms. Mantle's assessment is apparently based upon the dollars expended on this program; however, as per the tariff and noted below, not all costs are charged to the program when it is related to a minor repair. There are also instances where the program could provide even more customers a solution, but is currently unable to do so based on the current limitations on the dollars that may be spent per customer. Based on feedback we have received from agencies that work with such customers, we believe one of the reasons for the limited spend to date has been the lack of additional funds per customer, such as those proposed in these cases, to help in situations where repairs are simply not cost effective and a replacement is the only realistic option. The availability of such funding should help expand the program's reach. In any event, it is important to keep in mind that this program only seeks to recover costs that have been incurred, so lower costs are not a customer detriment.

Q. WHY DO YOU BELIEVE RED-TAG HAS BEEN SUCCESSFUL?

A. Because it has, on a very limited budget, done what it set out to do. The program has provided appliance repairs to customers of limited means who have made sufficient payments to qualify for gas service, but then find that their furnace or other appliance is not operating well enough for the Company to restore service. In addition to helping these customers maintain or restore natural gas service, the program has also helped them to avoid a potentially dangerous situation that could threaten them and their neighbors. To the extent the program has been successful in achieving this safety goal, I would consider it very successful indeed.

Q. OPC WITNESS MANTLE POINTED OUT THAT THERE HAVE BEEN NO INVOICES UNDER $20, INDICATING NO USE AT ALL OF THE "AVOID RED TAGS" PORTION OF THE PROGRAM. IS SHE CORRECT?

A. No. Under the "Avoid Red Tags" component of the program, there is no charge to the customer for minimal repairs so there are no invoices. Avoid Red Tags simply permits Laclede service technicians to fix a problem for the customer when the matter can be handled in less than 15 minutes with parts that cost less than $20. Rather than have our service personnel go through the process of leaving a red tag, having the customer call an HVAC company, who would charge a high "trip charge" to address a simple situation, and then requiring the Company to come back out to turn on the gas, the problem is handled quickly and efficiently, saving costs for all customers and the Company. Laclede tariffed this process because this very problem arises on occasion, and Laclede sought to avoid the customer inconvenience, waste and added cost of going through the exercise described above by codifying in its tariffs the more streamlined and sensible process provided by "Avoid Red Tags".

Q. IS THE RED-TAG PROGRAM MONETARILY BENEFICIAL?

A. I believe it is. As noted above, it allows those receiving assistance to continue receiving service rather than be disconnected. In addition to making a revenue contribution which benefits all customers, the program can also reduce the number of trips our employees have to make out in the field and the number of calls we take in our service center to serve that customer. It also improves the safety of the customer and perhaps his or her neighbors which, while not directly beneficial on a cost of service basis, does have very significant monetary benefits in terms of cost avoidance. In short, the red-tag program helps customers who need assistance at the time they actually need it. With limited spending, the red-tag program makes a direct and significant difference for customers who have otherwise qualified for gas service by allowing them to remain a customer and safely heat their homes.

Q. OPC WITNESS MANTLE STATES THAT MANY BENEFITS FROM PROGRAMS LIKE RED-TAG "ARE NON-MONETARY AND CANNOT BE MEASURED." (MANTLE REBUTTAL, P. 3) DO YOU AGREE?

A. In the realm of energy efficiency, we have different types of tests that quantify benefits that are not strictly dollars and cents. Experts are able to develop algorithms that convert what OPC witness Mantle considers 'vague' into a quantifiable value. As the consumer advocate, OPC has shown in the past its support of such societal benefits tests. Moreover, while it may be difficult to quantify a value for safety-oriented programs like Red-Tag, the same thing is true of other expenditures the Company routinely makes to keep its system and its customers safe. That is a value in and of itself. In fact, the Company considers safety its most important value, regardless of whether it may be "non-monetary" in nature.

Q. OPC WITNESS MANTLE NOTES THAT THE COSTS OF LOW-INCOME PROGRAMS ARE PAID IN PART BY OTHER LOWER INCOME CUSTOMERS, BECAUSE SUCH COSTS ARE SPREAD ACROSS CUSTOMERS REGARDLESS OF INCOME. HOW DO YOU RESPOND TO THAT?

A. Low-income programs are charged to all customers, but those charges are exceedingly small on a per customers basis. In contrast, the benefits for those customers who are eligible to participate in such programs can be substantial and make the difference between whether they are able to receive any service at all. These expenditures can literally be lifesaving when other options are simply not available or not enough to maintain service. While not perfect, terminating a program on this basis would certainly be throwing out the baby with the bath water.

Q. DOES THIS COMPLETE YOUR SURREBUTTAL TESTIMONY?

A. Yes.

Prepared: November 21, 2017

LACLEDE GAS COMPANY
MISSOURI GAS ENERGY

GR-2017-0215
GR-2017-0216

SCHEDULE SAW-S1

November 2017

SCHEDULE SAW-S1

Laclede Gas Residential Assumptions
Average Annual Use Per Customer = 806 Therms
Fiscal Year 2017 Average Annual Residential Bills = 595,457
Fiscal Year 2017 Residential Customer Additions = 2,291

	[A]	[B]	[C]
	At Present	FY 2017 Customer Additions at 10% below average annual use per customer	Totals After Incorporating Additions
Total Billed Usage	479,938,342	1,661,891	481,600,233
Total Bills	595,457	2,291.00	597,748.00
Average Annual Use per Customer	806	725	805.7

Prepared: November 21, 2017

LACLEDE GAS COMPANY
MISSOURI GAS ENERGY

GR-2017-0215
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SCHEDULE SAW-S2

November 2017

Comparison of rates excluding cost of gas:

SCHEDULE SAW-S2

Laclede-current	
Fixed charge	$ 19.50
Delivery charge/Therm	Block Rate
30 therm winter $.85579/0	
30 therm summer $.31290/.15297	
MGE	
Fixed charge	$ 23.00
Delivery charge/Ccf	$ 0.07380
Ameren Missouri	
Fixed charge	$ 15.00
Delivery charge/Therm	Block Rate
0-30 Ccf $0.7952/0	
Summit	
Fixed charge	$ 15.00
Delivery charge/Ccf	$ 0.62150
Liberty NE	
Fixed charge	$ 20.00
Delivery charge/Ccf	$ 0.27690
Liberty SE	
Fixed charge	$ 13.75
Delivery charge/Ccf	$ 0.18370
Liberty West	
Fixed charge	$ 20.00
Delivery charge/Ccf	$ 0.19206
Empire	
Fixed charge	$ 16.50
Delivery charge/Ccf	$ 0.20721
Missouri Average	**$ 17.84**

SCHEDULE SAW-S2

Oklahoma	
Oklahoma Natural Gas	
Fixed charge	$ 34.12
or	
Fixed charge	$ 16.98
Delivery charge/Ccf	$ 0.41143
Iowa	
Black Hills	
Customer charge	$ 18.25
Delivery charge/Ccf	$ 0.11635
Surcharges/Ccf	$ 0.02421
Kansas	
KGS	
Customer charge	$ 16.70
Delivery charge/Ccf	$ 0.22316
Atmos	
Customer charge	$ 19.31
Delivery charge/Ccf	$ 0.15450
Surcharges/Ccf	$ 0.03701
Arkansas	
Black Hills	
Customer charge	$ 11.58
Delivery charge/Ccf	$ 0.32890
Surcharges/Ccf	$ 0.06370
Illinois	
Ameren IL	21.35
Delivery Charge/Therm	0.14807
Bordering States Total Average	**$ 20.22**

Prepared: November 21, 2017

LACLEDE GAS COMPANY
MISSOURI GAS ENERGY

GR-2017-0215
GR-2017-0216

SCHEDULE SAW-S3

November 2017

a new standard

Berkshire Gas converts from CCF to therms

berkshire gas

Residential Heating Customer

CCF to Therm Comparison

OLD BILL - CCF

GAS USED

Billed for 30 days, Jan. 1, 2002 – Jan. 31, 2002

Present Actual Meter Read, Jan. 31, 2002	3225
Previous Actual Meter Read, Jan. 1, 2002	3025
Units of Gas in CCF	200

CHARGES FOR GAS USED
RESIDENTIAL HEAT WINTER, R3

Delivery Charges in CCF:

Customer Charge	$9.73

Distribution Charges:

125 CCF x $0.4438/CCF =	55.48
75 CCF x $0.3737/CCF =	28.03

Distribution Adjustment Charges:

200 CCF x $0.0240/CCF =	4.80

Total Delivery Charges for R3	$98.03

NEW BILL - THERMS

GAS USED

Billed for 30 days, Jan. 1, 2002 – Jan. 31, 2002

Present Actual Meter Read, Jan. 31, 2002	3225
Previous Actual Meter Read, Jan. 1, 2002	3025
Units of Gas in CCF	200
Therm Conversion Factor	1.024

Total Units of Gas in Therms	204.8

Delivery Charges in Therms:

Customer Charge	$9.73

Distribution Charges:

128 therms x $0.4334/therm =	55.48
76.8 therms x $0.3649/therm =	28.03

Distribution Adjustment Charges:

204.8 therms x $0.0234/therm =	4.80

Total Delivery Charges for R3	$98.03

HOW THE NEW STANDARD IS CALCULATED

Conversion of CCFs to Therms (multiply times therm conversion factor)

125 CCF x 1.024 therm conversion factor =	128.0 therms
75 CCF x 1.024 therm conversion factor =	76.8 therms

Conversion of Rates to Therms (divide by therm conversion factor)

$0.4438 / 1.024 therm conversion factor =	$0.4334/therm
$0.3737 / 1.024 therm conversion factor =	$0.3649/therm
$0.0240 / 1.024 therm conversion factor =	$0.0234/therm

The Berkshire Gas Company has always sold its natural gas to customers in the same way the gas is metered – in increments of hundred cubic feet (CCF). That will change this month, when the company converts its billing standard to therms.

Will this raise the cost of gas?

NO. The conversion process is NOT a rate increase. The cost of natural gas will not be affected. This is simply a change in the way we bill for the energy we deliver.

Why change?

The therm is the industry standard for energy measurement and it is used by substantially all natural gas utilities in America. Conversion to therms will make it easier for you to compare our prices to third party marketers.

What's the difference?

CCF is a measurement of space or volume. It represents the amount of gas contained in a space equal to one hundred cubic feet.

A therm is a measurement of energy content and is equal to 100,000 BTU (British thermal units)*. A CCF is approximately equivalent to 1 therm.

Will my bill change?

A "therm conversion factor" will be added to your monthly billing statement to convert the amount of energy you have used from CCF to therms. This factor will change monthly to reflect the actual energy content of the gas delivered that month. A comparison of the old and new formats can be found on the back of this notice.

Berkshire Gas will continue to deliver clean-burning, efficient natural gas with the same level of safety and reliability that you have come to expect over the years. If you have any questions about this notice, call the Berkshire Gas Customer Service Department at 1-800-292-5012.

berkshire gas

Energy You Can Count On. People You Can Trust.

* A BTU is defined as the amount of energy needed to raise the temperature of one pound of water one degree Fahrenheit.

Prepared: November 21, 2017

LACLEDE GAS COMPANY
MISSOURI GAS ENERGY

GR-2017-0215
GR-2017-0216

SCHEDULE SAW-S4

November 2017

SCHEDULE SAW-S4

Missouri Gas Energy
SIC Code/BTU Factors Report for October 2017

Billing Location Number	Billing Location Name	BTU Factor	Gas Date
134	Pineville	1026.192	10/01/2017
175	MGE Industrial Park	1028.502	10/01/2017
4812	Carthage	1029.276	10/01/2017
11740	Joplin	1028.795	10/01/2017
11792	Webb City	1028.712	10/01/2017
13745	Kansas City (Williams)	1014.49	10/01/2017
15066	Pleasant Hill	1013.008	10/01/2017
17404	Anderson	1028.434	10/01/2017
17408	Aurora	1028.376	10/01/2017
17454	Monett	1028.315	10/01/2017
17456	Monett	1028.26	10/01/2017
17458	Neosho	1028.035	10/01/2017
17460	Noel	1027.706	10/01/2017
17462	Ozark	1029.176	10/01/2017
17472	Republic	1028.425	10/01/2017
17476	Sarcoxie	1028.697	10/01/2017
17478	Seneca	1023.573	10/01/2017
23576	St Joseph	1013.663	10/01/2017
26312	Carrolton	1011.996	10/01/2017
26314	Concordia	1013.415	10/01/2017
26332	Higginsville	1012.608	10/01/2017
26344	Whiteman AFB	1012.706	10/01/2017
26392	Warrensburg	1013.05	10/01/2017
203170	Panhandle	1019.433	10/01/2017

Prepared: November 21, 2017

LACLEDE GAS COMPANY
MISSOURI GAS ENERGY

GR-2017-0215
GR-2017-0216

SCHEDULE SAW-S5

November 2017

RULES AND REGULATIONS

19. Extension of Distribution Facilities (Continued).

service pipe which lies in the public street or right-of-way, and which extends from the gas main to the customer's, or prospective customer's, property line.

The design and extent of any extension of the Company's facilities will be determined solely by the Company, applying sound principles of economics and engineering. Within this context, the Company will invest in distribution main and in that portion of the service pipe which extends from the property line to the meter the total amount determined, as follows:

For a prospective customer whose annual consumption is less than 6,000 therms, the Company will install at no cost to the customer up to 175 feet of main and 75 feet of service line. In no case, however, shall the Company be obligated to invest more than $1,000 per customer in the aggregate for both the main extension and service extension.

The number of prospective customers shall be that number established by the Company based on, but not limited to, the information supplied by the customer(s), a legal description of the area, maps, and the Company's experience in similar developments.

For a prospective customer whose annual consumption exceeds 6,000 therms, the amount of main and service the Company will install at no cost to the customer will be determined by the Company from an analysis of the character of service requested, the estimated annual revenue to be derived from the customer, the estimated annual cost of providing gas service and the estimated annual return to be derived from such investment.

E. Main and Service Pipe Extensions Beyond the Free Allowance.

Extension of distribution facilities, in excess of that provided by the free allowance as determined under Section D, will be made by the Company, provided the applicant requiring such extension deposits, as a contribution-in-aid-of-construction, the Company's estimated cost of such excess or requests that such excess amount be financed by the Company. If the customer requests financing, the Company shall determine the charge necessary to recover the excess investment over a 15 year period, unless a shorter period is requested by the customer. Such charge shall be designed to recover over that 15 year period all estimated property taxes, depreciation and carrying costs for the excess investment at a rate equal to the Company's overall cost of capital and shall be based on the number of customers who are expected to take service off of the new facilities in the next 5 years. Such charge shall be added to the fixed monthly charge of all customers receiving natural gas service off of the new facilities, provided that the charge shall be reduced during, or eliminated prior, to the expiration of the 15 year period if the number of customers or volumes exceed those initially anticipated when calculating the charge.

Laclede Gas Company — For — Refer to Sheet No. R-1
Name of Issuing Corporation or Municipality — Community, Town or City

RULES AND REGULATIONS

In any instance where financing of facilities is provided, the Company shall take steps to ensure that any customer who is or will be subject to the financing charge is notified of the amount, duration and other terms of the charge at the time the customer purchases a property from a developer or applies for service.

The Company shall maintain records of all financing arrangements provided under this provision showing for each facility extension and financing arrangement: (1) the calculation of the free allowance and excess amount to be financed; (2) the calculation of the per customer financing charge; (3) all amounts collected from customers as a result of application of the charge; and (4) the date on which the excess amount was fully collected and the charge removed from customer bills. The investment in excess of the free allowance and related costs shall not be included in general rates as part of the Company's cost of service, and in the event the excess amount cannot be fully collected over the 15year period specified in this section, any uncollected amount shall be absorbed by the Company.

19. Extension of Distribution Facilities (Continued).

F. Refund on Contributions for Main Extensions.

Only in those cases where the total number of prospective customers is uncertain, and no financing arrangement is entered into under Section D the Company may require a deposit for the Company's estimated investment cost in excess of that provided by the free allowance. If the number of customers connected within four years of the completion of the extension exceeds the number of customers estimated to be connected at the time the deposit was derived, all or a portion of such deposit will be refunded to the original contributor(s) in proportion to the amount of the original contribution(s). The refund(s) to be made will be determined by a survey of the additional customers connected to the extension. Such survey will be made within one year of the attachment of such customers. However, this Section F shall not apply to any contributions-in-aid-of-construction made pursuant to Section E, with respect to which no refunds will be made.

There shall be no refunds based on the attachments of customers to facilities which are main extensions of the customer extension for which contribution was originally made.

G. Refund Not to Exceed Original Contribution.

In no event shall refund made to the applicant exceed the original contribution.

H. Title to the Customer Extension.

All parts and portions thereof, regardless of any contribution made by the customer, shall be and remain in the Company.

DATE OF ISSUE April 11, 2017 (Month Day Year) — DATE EFFECTIVE May 11, 2017 (Month Day Year)

ISSUED BY C. Eric Lobser, VP Regulatory and Governmental Affairs, 700 Market St., St. Louis, MO 63101
Name of Officer — Title — Address

Laclede Gas Company — For — Refer to Sheet No. R-1
Name of Issuing Corporation or Municipality — Community, Town or City

RULES AND REGULATIONS

35. Conservation and Energy Efficiency Programs

The Energy Efficiency Collaborative ("EEC") was formed to develop a portfolio of cost effective energy efficiency programs for the Company's customers. Pursuant to this tariff and terms developed by the EEC the following programs have been established. Effective _____, the EEC shall be an advisory group only.

A. Residential High Efficiency Rebate Program:

The Company's Residential High Efficiency Rebate Program provides rebates to residential owners and customers for the installation of high efficiency heating systems, water heating systems, and thermostats as described below:

Equipment	Rated	Rebate
Gas furnace	Greater than or equal to 92% but less than 96% AFUE*	$200
Gas furnace	Greater than or equal to 96% AFUE*	$300
Gas boiler	Greater than or equal to 90% AFUE*	$300
Combined Space Heating/Water Heating (w/ tank)	High efficiency boiler w/sidearm tank, AFUE >= 90%	$450
Combined Space Heating/Water Heating (tankless)	Tankless boiler/water heater combination unit, EF Greater than or equal to 0.82	$450
Electronic programmable setback thermostat	Four pre-programmed settings for 7 day, 5+2 day, or 5-1-1 day models	$25 or 50% of the equipment cost, whichever is lower
Gas storage water heater greater than or equal to 20 gallons and less than or equal to 55 gallons	Greater than or equal to 0.67 EF**	$200
Gas storage water heater greater than 55 gallons and less than or equal to 100 gal	Greater than or equal to 0.77 EF**	$350
Gas instantaneous water heater less than 2 gallon	Greater than or equal to 0.82 EF**	$300

*Annual Fuel Utilization Efficiency

** Energy Factor

Laclede Gas Company — Name of Issuing Corporation or Municipality
For Refer to Sheet No. R-1 — Community, Town or City

RULES AND REGULATIONS

35. Conservation and Energy Efficiency Programs (continued)

Owners of, or customers living in, an individually metered dwelling unit, are eligible to participate in this program and must apply for rebates through the Company or through participating heating, ventilating and air conditioning ("HVAC") and plumbing contractors.

Rebate Limit: Individual dwelling units, as determined by account number, whether owner-occupied or rental property, are eligible for a maximum of two heating system rebates (furnace or boiler), two water heater rebates, or two combination unit rebates, and two thermostat rebates, under this program.

Owners of multiple individually metered dwelling units are limited to a maximum of 250 heating system rebates (furnace or boiler), 250 water heater rebates, or 250 combination unit rebates, and 250 thermostat rebates during one program year.

Laclede Gas Company	For	Refer to Sheet No. R-1
Name of Issuing Corporation or Municipality		Community, Town or City

RULES AND REGULATIONS

[Left blank intentionally]

DATE OF ISSUE	April 11, 2017	DATE EFFECTIVE	May 11, 2017
	Month Day Year		Month Day Year

ISSUED BY C. Eric Lobser, VP Regulatory and Governmental Affairs, 700 Market St., St. Louis, MO 63101

Name of Officer Title Address

RULES AND REGULATIONS

35. Conservation and Energy Efficiency Programs (continued)

A2. 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 Laclede Gas 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.

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 Laclede Gas. The direct-install measures will include programmable setback thermostats, low-flow faucet aerators, low-flow showerheads, insulating water-heater pipe wrap, and furnace clean & checks. Multifamily 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) 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.

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.

Program Description - The Company will co-deliver the Program with the local electric utility provider 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 the local electric utility or a program administrator to develop, implement, and maintain all services associated with the Program. Measures installed pursuant to the Program, 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.

The Company will work with the local electric utility to produce a post-implementation evaluation in order to quantify the impact of the Program.

35. Conservation and Energy Efficiency Programs (continued)

A3. Energy Efficiency Kits Program (the "Program")

Purpose – The objective of the Program is to raise customer awareness of the benefits of "high efficiency" products (EnergyStar, etc.) and to educate residential customers about energy use in their homes by offering information, products, and services to residential customers to save energy cost effectively.

Availability – The Program is available to Laclede Gas Residential customers and may be offered through various channels, such as direct mail, secondary education schools, community based organizations, and market-rate multifamily properties.

Program Description – The Company will partner with the local electric utility and a program administrator to implement this Program. The program administrator will provide the necessary services to effectively implement the Program and to strive to attain the energy savings targets. The Program incorporates various program partners, products, incentive mechanisms and program delivery strategies.

The Company in partnership with the electric utility and program administrator will follow a multi-faceted approach to educate participants and effectuate installation of energy efficiency products and actions addressed in the Energy Efficiency Kits.

The Company will work with the local electric utility to produce a post-implementation evaluation in order to quantify the impact of the Program.

Measures and Incentives- Energy Efficiency Kits may include Low Flow Faucet Aerators, Low Flow Showerheads, Pipe Wrap, and Dirty Filter Alarms.

RULES AND REGULATIONS

35. Conservation and Energy Efficiency Programs (continued)

B. Commercial and Industrial (C/I) Rebate Program:

The C/I Rebate program was established to provide commercial and industrial customers incentives through prescriptive (standard) rebates, as set forth below, and custom rebates, for the implementation of natural gas energy efficiency measures, including part or all of the cost of an energy audit that identifies a measure that subsequently results in a rebate through this program.

Customers implementing certain measures as described below will receive prescriptive rebates. All other rebates under this program will receive financial incentives which are customized or individually determined using the Societal Benefit/Cost Test, as defined in the latest edition of the California Standard Practice Manual for Economic Analysis of Demand-Side Programs and Projects.

Non-Profit Customers, defined as a government agency, public school district, or a customer that demonstrates it qualifies as a 501(c)(3) charity or as a benevolent corporation as defined by RSMo 352.010, may qualify for specific rebates as detailed below.

Prescriptive Rebates: Following is a list of the prescriptive rebates available for equipment and services under the C/I Rebate program:

35. Conservation and Energy Efficiency Programs (continued)

Equipment or Service	Rated	Rebate
Gas furnace	Greater than or equal to 92% but less than 94% AFUE*	$200
Gas furnace	Greater than or equal to 94% AFUE*	$250
Electronic programmable setback thermostat	Four pre-programmed settings for 7 day, 5+2 day, or 5-1-1 day models	$40 or 50% of equipment cost, whichever is lower
Radiant Infrared Heater (Low-intensity heater, electronic ignition only)***	Rated greater than or equal to 20,000 BTU/hour and less than or equal to 250,000 BTU/hour	$300
Condensing Unit Heater	Greater than or equal to 90% TE **	$300
High Temperature Heating & Ventilating (HTHV)Direct-Fired Gas Heaters	Greater than or equal to 90% TE	$500
Advanced Load Monitoring ("ALM") Boiler Control	ALM Retrofit to existing hot water space-heating boiler only	$2000
Hot Water Boiler Outdoor Temperature Reset ("OTR") Control	OTR Retrofit to existing hot water space-heating boiler only.	$200
Continuous modulating burner	Burner replacement considered efficiency improvement.	25% of equipment cost or $15,000 per burner, whichever is lower
Gas-fired boiler tune up Non-Profit Customers	Submit combustion test results performed before and after turn up. Eligible for tune up every two years.	75% of the cost up to $750 per boiler, whichever is lower
Gas-fired boiler tune up All other C/I customers	Submit combustion test results performed before and after turn up. Eligible for tune up every two years.	50% of the cost up to $500 per boiler, whichever is lower

*Annual Fuel Utilization Efficiency
** Thermal Efficiency
*** All outdoor radiant infrared heating applications such as outdoor patios and golf ranges are not eligible.

RULES AND REGULATIONS

35. Conservation and Energy Efficiency Programs (continued)

Equipment or Service	Rated	Rebate
Gas space heating hot water boiler less than 300 MBH input	Greater than or equal to 85% and less than 92% AFUE*	$2.50 per MBH
Gas space heating hot water boiler from 300 MBH to 2,500 MBH input	Greater than or equal to 85% and less than 92% TE**	
Gas space heating hot water boiler greater than 2,500 MBH to 5,000 MBH input	Greater than or equal to 85% and less than 92% CE***	
Gas space heating hot water boiler less than 300 MBH input	Greater than or equal to 92% AFUE*	$3.00 per MBH
Gas space heating hot water boiler from 300 MBH to 2,500 MBH input	Greater than or equal to 92% TE**	
Gas space heating hot water boiler greater than 2,500 MBH to 5,000 MBH input	Greater than or equal to 92% CE***	
Gas space heating steam boiler less than 300 MBH input	Greater than or equal to 82% AFUE*	$1.75 per MBH
Gas space heating steam boiler from 300 MBH to 5,000 MBH input	Greater than or equal to 82% TE**	
Space Heating steam trap replacement or rebuild	Steam trap replacement or rebuild of failed trap considered efficiency improvement	50% of the equipment cost for trap replacement or rebuild kit, up to $100 per steam trap
Process and/or industrial steam trap replacement or rebuild	Steam trap replacement or rebuild of failed trap considered efficiency improvement	50% of the equipment cost for trap replacement or rebuild kit, up to $200 per steam trap
Vent damper	Damper installation considered efficiency improvement	50% of equipment cost or $500 cap per boiler, whichever is lower
Primary air damper	Damper installation considered efficiency improvement.	50% of equipment cost or $500 cap per boiler, whichever is lower
Gas Instantaneous Water Heater < 2 gallon	Greater than or equal to 0.82 EF****	$300
Condensing Storage Water Heater Greater than 75,000 and less than or equal to 500,000 BTU/hour input	Greater than or equal to 90% TE**	$450

*Annual Fuel Utilization Efficiency (AFUE) ** Thermal Efficiency (TE)
***Combustion Efficiency (CE) ****Energy Factor (EF)

MBH is a thousand BTUs per hour

Laclede Gas Company — For — Refer to Sheet No. R-1
Name of Issuing Corporation or Municipality — Community, Town or City

RULES AND REGULATIONS

35. Conservation and Energy Efficiency Programs (continued)

Equipment or Service	Rated	Rebate
Food service gas steamer	ENERGY STAR qualified	50% of the equipment cost or $475, whichever is lower
Food service gas fryer	ENERGY STAR qualified	50% of the equipment cost or $350, whichever is lower
Food service griddle Top and bottom surfaces of clamshell models must be gas	ENERGY STAR qualified	50% of the equipment cost or $400, whichever is lower
Food service gas convection gas oven	ENERGY STAR qualified	50% of the equipment cost or $200, whichever is lower
Combination Oven	ENERGY STAR qualified	50% of the equipment cost or $500, whichever is lower
Conveyor Oven	New natural gas conveyor oven with baking energy efficiency of greater than 42%, and an idle energy consumption rate less than 57,000 BTU/hour utilizing ASTM standard F1817	50% of the equipment cost or $300, whichever is lower
Rack Oven – single rack	New natural gas rack oven with baking efficiency greater than or equal to 50% utilizing ASTM standard 2093	50% of the equipment cost or $500, whichever is lower
Rack Oven – double rack	New natural gas rack oven with baking efficiency greater than or equal to 50% utilizing ASTM standard 2093	50% of the equipment cost or $1,000, whichever is lower

DATE OF ISSUE April 11, 2017 (Month Day Year) — DATE EFFECTIVE May 11, 2017 (Month Day Year)

ISSUED BY C. Eric Lobser, VP Regulatory and Governmental Affairs, 700 Market St., St. Louis, MO 63101
Name of Officer — Title — Address

35. Conservation and Energy Efficiency Programs (continued)

Equipment or Service	Rated	Rebate
Infrared Char broiler	Natural gas char broiler with infrared burners replacing or instead of a char broiler without infrared burners	50% of the equipment cost or $300, whichever is lower
Infrared Salamander Broiler	Natural gas salamander broiler with infrared burners replacing or instead of a char broiler without infrared burners	50% of the equipment cost or $200, whichever is lower
Infrared Rotisserie Oven	Natural gas rotisserie oven with infrared burners replacing or instead of a rotisserie over without infrared burners	50% of the equipment cost or $300, whichever is lower
Kitchen Demand Control Ventilation ("KDCV")	High efficiency KDCV must be a control system that varies the exhaust and/or make-up air flow rate(s) based on heat and smoke or vapors generated by cooking equipment. Temperature, timers, optical or other sensors may be used to sense ambient conditions and vary the speed of exhaust and/or make up air fans to meet ventilation requirements	$300
Kitchen low flow spray wash nozzle. Maximum of 2 nozzles.	*GPM rating of 1.6 or less	50% of equipment cost or $100 per nozzle, whichever is lower

*Gallons Per Minute

35. Conservation and Energy Efficiency Programs (continued)

Custom Rebates: The C/I Rebate program will provide custom rebates to C/I customers for the installation of any natural gas related energy efficiency improvement that does not qualify for a prescriptive rebate. All custom rebates will be individually determined and analyzed to ensure that they pass the Societal Benefit/Cost Test. Any measure that is pre-qualified (evaluated prior to being installed), must produce a Societal Benefit/Cost test result of 1.0 or higher.

Rebates are calculated as the lesser of the following:

- No rebate for measures with less than a two year payback
- A buy-down to a two year payback
- $6.63 per MCF saved during the first year

Audit: The energy audit rebate will only be provided to a customer that qualifies for a prescriptive and/or custom rebate under this program. The audit rebate offer will be structured as follows:

- *Non-Profit Customers* will be eligible for a rebate of 75% of the audit cost, $600 per building under 25,000 sq. ft., or $750 for buildings 25,000 sq. ft and over, whichever is lower.
- All other C/I customers will be eligible for a rebate of 50% of the audit cost, $375 per building under 25,000 sq. ft., or $500 for buildings 25,000 sq. ft. and over, whichever is lower.
- For customers with more than one building per account, there is a limit of three audit rebates per customer per program year. Energy for each audited building must be estimated based on total utility metered use if sub-metered data is not available.
- No customer building shall qualify for a second audit rebate under this program.
- Audits must be performed by qualified professionals (Registered Professional Engineer, Registered Architect, Certified Energy Manager, or equivalent training, experience, and continuing education). Audit procedures and reports must reach the level of effort of a Level I - Walk-Through Analysis as described in the most recent edition of "Procedures for Commercial Building Energy Audits" published by the American Society of Heating, Refrigerating, and Air Conditioning Engineers.
- To be eligible for a rebate, the audit report must identify at least one energy efficiency measure which qualifies for a rebate under this program, the energy efficiency measure must be implemented, and the application for the audit rebate must be included in the application for the qualifying energy efficiency measure.

RULES AND REGULATIONS

35. Conservation and Energy Efficiency Programs (continued)

Rebate Limit: During a program year, a commercial or industrial customer's total rebate is limited to $100,000 or the remaining uncommitted budget for the current program year, whichever is lower. Remaining uncommitted program budgets may be reallocated to other programs if not part of unexpired rebate pre-approvals committed for proposed customer projects. All measures that receive pre-approval must be implemented / installed within six (6) months of the date of pre-approval, and all invoice(s) and other required project documentation must be submitted within eight (8) months of the date of pre-approval.

35. Conservation and Energy Efficiency Programs (continued)

C. Building Operator Certification Program

The purpose of the Building Operator Certification ("BOC") Program is to help the Company's commercial and industrial customers improve energy efficiency in the operation of their facilities. The Missouri Department of Natural Resources Energy Center ("DNR-EC") provides the Level I and II BOC training series in Missouri under license from the Midwest Energy Efficiency Alliance ("MEEA") which administers BOC in the Midwest. BOC is a hands-on training and certification program covering building operation and maintenance for building operators.

The Company will enter into an agreement with DNR-EC to offer BOC training in the Company's service area, and will provide payments to DNR-EC to be used for its expenses in preparing one or more training series in the Company's service area. Customers of the Company whose employee(s) complete a BOC course provided by DNR-EC and receive certification may be eligible for the following rebates of tuition expenditures depending on their eligibility for rebates from other sources:

Customer Eligibility for Rebates from Other Sources	Amount of Rebate
Customer pays full tuition and is eligible for a rebate from its electric service provider for less than 25% of tuition expenditures	The difference between 50% of full tuition expenditures and the rebate offered by the electric service provider
Customer pays full tuition and is eligible for a rebate from its electric service provider for 25% to 35% of tuition expenditures	Equal to the rebate offered by the electric service provider
Customer pays full tuition and is eligible for a rebate from its electric service provider for more than 35% of tuition expenditures	The difference between 70% of full tuition expenditures and the rebate offered by the electric service provider
Customer is eligible for rebates from other sources besides its electric service provider	No rebate

Customers are not eligible for a rebate for any employee that has previously taken the BOC course, even if they were not an employee of the customer at the time.

Funding is limited. Eligible customers who submit timely rebate applications to the Company will be provided rebates while sufficient funding allows, on a first-come, first-served basis, determined by date of registration for the training series.

35. Conservation and Energy Efficiency Programs (continued)

D. Program Year:

Effective beginning in 2013 the program year will begin on October 1 and end on September 30 of the following year, except for the first year of each new program, in which case the program year will begin with the Commission-approved effective date of the tariff sheets originally filed to implement such program.

E. Program Tracking and Reporting:

Within forty-five days of the end of each calendar quarter, the Company shall submit a status report to the EEC regarding the cost and participation of its conservation and energy efficiency programs including:

- the number of energy efficiency measures implemented, summarized by measure type, and customer type for each calendar quarter and cumulatively for the fiscal year or program year; (Measure Types: Residential - summarized for each type of prescriptive equipment or service. Commercial and Industrial - summarized for each type of prescriptive equipment or service, type of custom rebate, and for the audits.)

- funds invested in each energy efficiency program for each calendar quarter and cumulatively for the fiscal year or program year.

- estimated savings for each energy efficiency program for each calendar quarter and cumulatively for the fiscal year or program year

F. Post-implementation Evaluation:

A detailed post-implementation evaluation of the initial two (2) years of each new program shall be completed within six (6) months of the end of each program's second year. Additionally, a detailed post-implementation evaluation of the Residential High Efficiency Rebate and Commercial and Industrial Rebate Programs will be completed no later than December 1, 2017. Where feasible, these reviews will include both process evaluations and cost effectiveness (impact) evaluations. Evaluations may be performed after less than two years of program implementation if the Company determines this is preferable. Further evaluation of existing programs may be performed as determined by the Company. Post-implementation evaluations will then be used in the selection and design of future programs.

RULES AND REGULATIONS

G. MGE Specific Programs

Independence Power & Light (IPL) Pilot Weatherization Program

A. Purpose

The IPL Pilot Weatherization Program is an experimental co-delivery program between IPL and MGE designed to provide weatherization improvement measures to create long-term (natural gas) bill reduction savings to low-income single family MGE natural gas customers within the IPL service territory.

B. Definitions:

Administrator: Truman Heritage/Habitat for Humanity (THHFH) will administer the pilot program for IPL and MGE pursuant to a written contract between THHFH and Laclede Gas Company.

Participant: Single family property owners who are MGE natural gas customers with natural gas space-heating equipment and/or water heating equipment whose income does not exceed 50% of the average median income (AMI) for Jackson County, Missouri as published by the U.S. Department of Housing and Urban Development (HUD) and reside within the IPL service territory.

Program Term: From the effective date of the tariff to run concurrent with the IPL Program, not to exceed 10 months.

C. Availability:

Household selection into IPL pilot weatherization program the will be based on the need of the family, willingness to partner, income eligibility and homeowner signature on a Homeowner Agreement. Qualifying households will be served on a first come first served basis with "first come" being determined by the receipt of a competed qualifying program application by THHFH. Mobile homes and rental properties are not eligible for this pilot program.

D. Terms and Conditions:

The THHFH will conduct a "clip board" audit within the eligible homes with energy saving measures identified. The THHFH Construction Director shall then approve a detailed scope of work for each home consistent with a list of weatherization services which include HVAC repair/replacement with a 90%+ AFUE or greater, attic insulation – up to R-49, water heater replacement and other general sealing and weatherization measures including weather-stripping, caulking, outlet/light switch gaskets, installation of other minor sealing materials where feasible, minor exterior home repair to reduce air infiltration, HVAC filter replacement for existing systems, low-flow faucet aerators and showerheads, and water heater insulation pipe wrap.

The cost of weatherization services provided for any single household cannot exceed $7,500 with the total allocated 50% - IPL and 50% - MGE.

E. Program Funding

A maximum of $46,000 will be applied to this pilot weatherization program for MGE's share of the funding.

G. MGE Specific Programs (continued)

Income Eligible Multi-Family Direct Install Program

Purpose: 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.

Administrator: 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 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.**

G. MGE Specific Programs (continued)

Income Eligible Multi-Family Direct Install Program

Program Provisions: 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.

Program Cost: The total budget for each year of the Program shall be calculated and filed annually by the Company as part of its annual budget filing for all energy efficiency program expenditures. 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 Term: From the effective date of the tariff to run concurrent with the KCP&L and GMO Programs.

G. MGE Specific Programs (continued)

Whole House Efficiency Program

Purpose: 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.

Administrator: 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 space-heating 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.

RULES AND REGULATIONS

G. MGE Specific Programs (continued)

Whole House Efficiency Program

Program Cost: The total budget for each year of the Program shall be calculated and filed annually by the MGE as part of its annual budget filing for all energy efficiency programs. 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 Term: From the effective date of the tariff to run concurrent with the KCP&L and GMO Programs.

H. **LAC Specific Programs**

Residential Direct-Install Low Income Program

Purpose - The purpose of the Residential Direct-Install Low Income Program is to deliver long-term natural gas savings and bill reductions to low income customers who occupy multifamily and single-family dwelling units within the LAC 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.

Availability - The Program is available to income qualified multifamily and single-family properties that contain natural gas space-heating and/or water-heating equipment and receive gas service from LAC. The direct-install measures will include programmable setback thermostats, low-flow faucet aerators, low-flow showerheads, and insulating water-heater pipe wrap. Multifamily dwelling units are defined as structures of three (3) or more attached unit complexes. Single-family dwellings are defined as residents of single-family and duplex housing units. Residents may include but are not limited to families, the elderly, or disabled that are income qualified. For the purposes of this Program the term "income qualified" refers to tenant occupants residing in federally subsidized housing units and who fall within that federal program's income guidelines. 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.

Program Description - The Company will co-deliver the Program with the local electric utility provider so that eligible customers utilizing both services may receive energy savings and bill reductions from both energy sources. The Company will offer a similar Program to qualifying federally subsidized housing units within multifamily properties where the local electric utility already installed electric energy saving measures but where gas saving measures was bypassed. Under both Programs the Company will enter into a contract with a Program Administrator, selected by the Company, to develop, implement, and maintain all services associated with the Program. Each Program Administrator will direct the necessary services to provide the installation of Program-specified measures noted. Measures installed pursuant to the Program, 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.

A detailed post-implementation evaluation by an independent evaluation contractor selected by the Company shall be completed within six (6) months following conclusion of the Program's second year. If feasible, this detailed evaluation will include both a process evaluation and at a minimum, a preliminary cost effectiveness (impact) evaluation.

RULES AND REGULATIONS

35. Conservation and Energy Efficiency Programs (continued)

I. EEC Membership and Process. The members of the ECC include the Company, the Staff of the Missouri Public Service Commission, the Office of the Public Counsel, the Division of Energy, the National Housing Trust and other members that may be designated from time to time by agreement of the Charter Members or by Order of the Commission. The EEC shall meet on a periodic basis to discuss and provide input on energy efficiency measures that the Company is proposing to adopt, modify or eliminate. The Company shall also provide EEC members with information regarding the ongoing performance of the various energy efficiency programs previously approved by the Commission.

J. Funding of Energy Efficiency Programs. The rates established in Case Nos. GR-2017-0215 and GR-2017-0216 include an allowance in rates of $2,033,354 for LAC and $1,794,361 for MGE to fund ongoing energy efficiency program expenditures. This is exclusive of any rate allowances approved to recover the costs previously incurred and deferred for prior program expenditures. The Company will fund energy efficiency programs, on an annual basis, toward the goal of .75% of the Company's gross operating revenues. Subject to the filing of an annual budget for all their respective energy efficiency programs, both LAC and MGE are authorized to increase program funding in any annual period to a level no greater than 25% of the amount derived by averaging 0.5% of their respective jurisdictional gas distribution operating revenues for the three years ending September 30, 2016. The annual budget filed by LAC and MGE shall specify the level of expenditures that the Company is proposing to make for each program approved by the Commission and any new program that the Company proposes to implement. Within 30 days of the filing of the annual budget, any member of the EEC or other interested party shall be free to recommend to the Commission for its approval a higher or lower amount of funding for any specific program or that a new program be implemented and any member or interested party shall be free to support or oppose such request. Any funding amounts not objected to within 30 days may be spent effective with the beginning of the next annual budget period. Expenditures for programs that are subject to a dispute shall be made in accordance with any Commission determination resolving such dispute, which determination shall be made within 90 days of the filing of the annual budget. The Company may also propose new programs or funding changes between its annual filings and such filings shall be disposed of in the same manner. Any difference between the rate allowance provided for herein for ongoing energy expenditures and the expenditures actually made by the Company subject to the foregoing process shall be deferred as a regulatory asset or liability, as applicable, and recovered from or returned to customers in the LAC's or MGE's next rate case over a five-year period through an adjustment to rate base. A carrying cost equal to the prime bank rank (as published in the Wall St. Journal on the first business day of each month) minus two percentage points shall be applied to any balances being deferred, provide that that the carrying cost used shall not be less than zero.

RULES AND REGULATIONS

36. Experimental Low-Income Energy Affordability Program

This Low-Income Energy Affordability Program (the "Program") is provided to eligible customers in the service territories of LAC and MGE under terms approved by the Commission in Case Nos. GR-2017-0215 and GR-2017-0216.

1. The Program will be jointly administered by the LAC and MGE and selected Community Action Agencies and other similar social service agencies (CAA) in the LAC and MGE service territories Compensation to the CAA for these duties will be negotiated between the Company, Staff, Public Counsel and the CAA, but shall be no greater than 10% of Program Funds.
2. All households enrolling in the Program shall be required to register with a CAA, apply for any energy assistance funds for which they might be eligible, and review and agree to implement cost-free, self-help energy conservation measures identified by the CAA. In addition, all applicants will be provided with basic budgeting information, as well as information about other potential sources of income such as the Earned Income Tax Credit. The CAA may use household registration from other assistance programs to determine eligibility for the Program. The CAA shall also make an effort to identify eligible participants who, because of their payment history or other factors, have a greater opportunity to successfully complete the program.
3. The Program shall be funded at a total annual level not to exceed $600,000 for LAC and $500,000 for MGE (of which no more than 10% shall be set aside annually for each operating unit to pay for the administrative costs specified above) and shall consist of the Fixed Charge Assistance Program and the Arrearage Repayment Program (ARP). Such total funding level shall not be increased or decreased prior to the effective date of rates in the Company's next general rate case proceeding, provided that any amounts not spent in any annual period shall be rolled over and used to fund the Programs in the next annual period. Upon termination of the Programs, any unspent amounts shall be used to fund low-income energy assistance, low-income weatherization, or energy efficiency programs for customers who receive natural gas services from Laclede.
4. Fixed Charge Assistance Program. The FCAP shall be funded in the amount of $300,000 annually for LAC annually and $250,000 annually for MGE, minus up to 10% for CAA support costs, and made available to households with incomes ranging from 0% to 185% FPL. Assistance under the FCAP shall be made available to eligible customers in the form of a monthly credit equal to fixed monthly charges (excluding ISRS charges) then in effect for LAC and MGE, respectively.

36. Low-Income Energy Affordability Program (continued)

5. Any customer entering the FCAP who has arrearages remaining after making the initial payment required under the Cold Weather Rule, or any other payment required to maintain or obtain service, shall also be required to enroll in the Arrearage Repayment Program. Any customer who successfully participates in the FCAP shall also be eligible to participate in the Summer ARP.

6. Arrearage Repayment Program. The ARP shall be funded at the level of $300,000 for LAC and $250,000 for MGE annually, minus up to 10% for administrative costs, and made available to households with incomes ranging from 0% to 185% FPL.

7. LAC and MGE will work with the CAAs to provide them with information necessary to identify households with past-due accounts that may be eligible for the ARP.

RULES AND REGULATIONS

36. Low-Income Energy Affordability Program (continued)

8. Customers may enroll in the ARP in October – December period or April – June period. Customers enrolling in October – December may receive an arrearage repayment in an amount sufficient to cover the difference between any LIHEAP grant or other energy assistance grant received by the customer and the arrearage repayment amount required to maintain or restore gas service, provided that such amount does not exceed $300 and the customer pays 10% of such amount. Subsequent arrearage repayments made by the customer for any remaining arrearage balance shall be matched by the Company until the balance is fully paid. For customers who enroll in the ARP in the months of April through June, the ARP will provide arrearage repayment assistance upon the following terms:
   - The customer shall first make a payment sufficient to reduce his or her arrearage balance by one-third of the unpaid balance. Upon making this initial payment, the customer will receive an ARP credit equivalent to 15% of his or her arrearage balance to be paid from Program funds.
   - On November 1, any customer who has successfully remained current in the ARP will receive an additional Program credit to be applied to their arrearage balance in the amount of 15% of their original arrearage balance. If the data reveals that 35% or more of the customers receiving the initial 15% credit have missed more than one payment over the remaining summer months (May-October), the granting of the initial 15% ARP credit will be discontinued and applied on November 1 along with the 15% November ARP credit after successful Program participation in the preceding April through October timeframe, unless the Parties agree otherwise.
9. When a customer's arrearage has been repaid, he or she will no longer be eligible for the ARP.
10. While the customer is successfully participating in the ARP, he or she will not incur late payment charges on the outstanding arrearage balance amounts covered under the Program agreement; however, a customer will be allowed one late payment during both the summer (May-October) and winter (November-April) months without incurring late fees or losing eligibility to remain in the Program, provided that the customer pays all amounts owed under the Program by the next applicable billing payment date.
11. If a customer fails to satisfy the requirements of the ARP, then he or she will be terminated from the Program, unless the CAA determines and notifies the Company that, in its judgment, there have been 'extenuating circumstances' that make this action inappropriate and the Company agrees with such determination.

RULES AND REGULATIONS

36. Low-Income Energy Affordability Program (continued)

12. Neither the FCAP nor the ARP will affect any of the provisions of the Cold Weather Rule, including the initial payment requirements thereunder; provided, however, that the monthly amounts due after deducting Bill Payment Assistances shall be substituted in lieu of the monthly budget plan payments due under the Cold Weather Rule and in section 10(B) of the Company's tariff under the Cold Weather Maintenance of Service.
13. Program tracking information will be collected by the Company and the CAA. The information to be collected, and the format in which it will be provided, is provided as Attachment 4A to the Stipulation and Agreement. This information will be made available to all Parties in early July of each year in an electronic version.
14. Representatives of the Parties, including the Staff, Public Counsel, Division of Energy, NRT and the Consumers Council, in consultation with the CAA, will meet in late September of each year to discuss the Program results from the previous year. Subject to the requirements of paragraph 3, the Parties can propose at such time adjustments to the Program parameters or the allocation of funding levels for the Winter Bill Payment Assistance or ARP Programs.
15. Any disagreement as to the interpretation or implementation of any of the foregoing items may be taken to the Commission for a decision.

RULES AND REGULATIONS

37. Economic Development Rider - EDR

1. Purpose: The purpose of this Economic Development Rider is to encourage economic development in Missouri and efficient utilization of the existing company system and services.

2. Availability: a. Service under this rider is available to: (1) customers or prospective customers who have or are expected to have usage exceeding 30,000 Dth/year; or (2) customers who are already receiving natural gas service from the Company and are seeking expand their business in a manner that will result in expanded usage over current usage of at least 15,000 Dth/year; or (3) customers who are already receiving natural gas service from the Company and are seeking to move to a new location within the Company's service territory that will result in expanded usage over current usage of at least 15,000 Dth/year; or (4) existing customers who have had usage exceeding 30,000 Dth/year in each of the preceding 3 years, and who are expected to have usage exceeding 30,000 Dth/year going forward pursuant to qualifying economic development incentive award.
b. Limitations: Availability of this rider is further limited to customers (i) that do not primarily provide goods and services that can be directly accessed by the general public at such location and (ii) that are receiving qualifying incentives by state, regional, or local economic development agencies or governmental units to retain existing business activity, encourage the expansion of existing business activity, or attract new business activity. To qualify, such incentives must be of a monetary value equal to or greater than the value of the discount provided under this Rider. Such incentives must be received at the location and for the use for which the customer seeks this discount, and the actual award of the incentives must be contractually finalized before any discount shall be provided under this EDR. The customer must also sign an affidavit attesting to the fact that the discounts provided under the EDR were critical to the customer's decision to create, maintain or increase usage at such location.

3. Applicability Upon election of the customer or potential customer and acceptance by the Company, the provisions of this rider are applicable to all qualifying usage for the length of the contract which shall not exceed 5 years. All sales or transportation volumes delivered to new customers shall be considered qualified volumes with respect to the incentive provisions of this rider. For existing customers, qualified volumes shall be the sales or transportation volumes delivered during each contract year in excess of the current usage volumes, provided customer's annual natural gas requirement in each contract year exceeds the current usage requirement by at least 15,000 dth/yr.

All requests for service under this rider shall be considered by the Company; however, in no event shall any provision of this rider apply to a customer's consumption for a period prior to the date the Company accepts the customer's application hereunder. If a qualifying customer's use of natural gas subsequently becomes insufficient to meet the requirements of this rider, the incentive provisions contained herein shall cease and the customer shall be served under the applicable rate schedule for such reduced requirements.

RULES AND REGULATIONS

37. Economic Development Rider – EDR (continued)

4. Incentive Provisions The contract for service hereunder shall begin on the date the Company approves the customer's application and shall continue for a period of five years. Customers receiving service under this rider shall be billed at the standard rates and charges for the applicable rate schedule as adjusted by the following incentive provisions:

a. Rate Discount: With respect to the qualified volumes, the commodity margin of the sales or transportation rate will be discounted by an average annual amount of 20%, provided that such discount shall not exceed 30% during any contract year. Within these parameters, the EDR contract shall specify the level of discounts as a percent of non-gas/non-ISRS charges that shall be provided for each contract year that, in the Company's discretion and based on the needs of the customer will be most effective in retaining, expanding or attracting the customer. After the fifth contract year, this incentive provision shall cease. Usage taken into consideration. Certification (affidavit)

b. Local Service Facilities: The Company shall install additional facilities to serve the customer subject to the Company's economic analysis of the new or expanded load on an ongoing basis, as calculated at the standard rates and charges for the applicable rate schedule.

c. Revenue Limitation: The total dollar amount of the incentives provided under this rider shall not exceed one percent (1%) of the Company's jurisdictional gross revenues during each calendar year; provided, however, the Company shall have the right at any time and for good cause shown to seek a modification of this limitation upon application to the Commission.

5. Term: Upon application by the Company and approval of the Commission, this EDR may be frozen with respect to new or expanded loads. Any customer receiving service under the EDR on the date it is frozen may continue to receive the benefits of the incentive provisions herein through the first five years of such customer's contract provided the customer continues to meet the requirements of this EDR.

RULES AND REGULATIONS

37. Economic Development Rider – EDR (continued)

6. Reporting: During the term of this rider the Company will prepare and submit an annual report to the Commission listing the names and locations of customers receiving service hereunder and a statement of incentives provided to each customer during the reporting period. The report will also describe the basis used to qualify each customer added to the Company's economic development program during the reporting period. The report will include an affidavit respecting each customer receiving service under the EDR in a given year, certifying that the Company has verified that the customer continued to meet applicable usage requirements throughout the subject year together with any customer or governmental verifications showing the customer is complying with any requirements or conditions necessary to receive qualifying incentives from the state, regional, local or other economic development agency or governmental unit.

7. Other: Prior to any determination of the Company's revenue requirement for rate making purposes before the Commission, test year revenues shall be adjusted to reflect the average annual discounted revenue to be in effect during the next three years following the effective date of new rates considering both the contracted for discount and any guaranteed customer usage commitments over such period, and provided further that the customer still qualifies for such discounts under the requirements set forth in the EDR.

8. Adjustments and Surcharges: The rates hereunder are subject to adjustment as provided in the following schedules: Infrastructure System Replacement Surcharge, Purchased Gas Adjustment/Actual Cost Adjustment Clause; Tax and License Rider

9. Regulations: Service under the EDR is subject to Rules and Regulations filed with the Commission

RULES AND REGULATIONS

38. Special Contracts Rider - SCR

1. Purpose: This tariff is designed for two purposes. First, it permits Company to meet specific competitive threats, which if not responded to would result in lost margin to the Company and its customers. By attempting to meet competition, Company will seek to preserve or increase some contribution to the fixed costs all customers must pay for in rates. Second, the tariff can be used to serve and retain or attract load customers who require a service structure not found in Company's standard tariffs.

2. Availability: Service under the SCR is available to customers or prospective customers who have or are expected to have usage exceeding 30,000 Dth/yr and that either have competitive alternatives for serving all or a portion of their natural gas load requirements or require a special form of service not otherwise available.

3. Applicable: Upon election of the customer or potential customer and acceptance by the Company, the terms and conditions of this special contract provision shall be applicable to all qualifying usage for the length of the Special Contract which shall not exceed 15 years. All sales or transportation volumes delivered to new or existing customers shall be considered qualified volumes with respect to the incentive provisions of this rider.

   All requests for service under this provision will be considered by the Company where the customer has demonstrated to the Company that it has competitive energy alternatives and a negotiated rate is necessary. However, in no event shall any provision of this rider apply to a customer's consumption for a period prior to the date the Company accepts the customer's application hereunder. If a qualifying customer's use of natural gas subsequently becomes insufficient to meet the requirements of this rider or the, the incentive provisions contained herein shall cease and the customer will be served under the applicable rate schedule for such reduced requirements.

RULES AND REGULATIONS

38. Special Contract Rider – SCR (continued)

4. Negotiated Rate and Term Provisions. The contract for service hereunder shall begin on the date the Company accepts the customer's application and shall continue for a period not to exceed 15 years. Customers receiving service under this rider shall be billed at the negotiated level of rates and charges, provided that in no event shall such negotiated level of rates and charges be less than that required over the contract term to cover the cost of all incremental investments made by the Company to serve the customer, including all related costs, such as cost of capital, associated property taxes and depreciation, and any other incremental costs to serve the customer, plus a level of contribution to the Company's fixed cost consistent with retaining or attracting the customer. In no case shall such a rate be below the incremental cost for distribution service or provide any negotiated rate related to commodity charges.

   The total dollar amount of the incentives provided under the SCR shall not exceed one percent (1%) of the Company's jurisdictional gross revenues during each calendar year; provided, however, the Company shall have the right at any time and for good cause shown to seek a modification of this limitation upon application to the Commission.

5. Termination: Upon application by the Company and approval of the Commission, this Special Contract provision may be frozen with respect to new or expanded loads. Any customer receiving service under a special contract on the date it is frozen may continue to receive the benefits of the incentive provisions herein through the first five years of such customer's contract provided the customer continues to meet the requirements of this rider.

RULES AND REGULATIONS

38. Special Contract Rider – SCR (continued)

6. Reporting: At least 30 days prior to the effective date of the Special Contract, Company will provide a copy of the Special Contract and supporting documentation to the Commission Staff with a copy to the Office of the Public Counsel. The supporting documentation will include the following eight (8) items:

a. Customer Needs: Company shall provide a narrative description of the reasons why the Special Contract Customer should not or cannot use the generally available tariff. This description shall include the special needs of this Customer for a different form of service and/or the competitive alternatives available to the Customer. In addition, this description shall include the consequences to the Customer if the Special Contract is approved.

b. Customer Alternatives: Company shall provide its estimate of the cost to the Customer for each competitive alternative available to the Customer. This estimate shall be for the time frame of the Special Contract, or by each year for multi-year contracts.

c. Incremental and Assignable Costs: Company shall quantify the incremental cost that can be avoided if the Special Contract Customer reduces load or leaves the system, and the incremental cost incurred if the Special Contract Customer is a new load or expands existing load. Company shall also identify and quantify the embedded and replacement value of all specific facilities (e.g., distribution) that are assignable to serving the Special Contract Customer. This quantification shall be for the time frame of the Special Contract, or by each year for multi-year contracts. All significant assumptions shall be identified that affect this quantification.

38. Special Contract Rider – SCR (continued)

d. Profitability: Company shall quantify the profitability of the Special Contract as the difference between the revenues generated from the pricing provisions in the Special Contract compared to Company's incremental costs. All significant assumptions shall be identified that affect this quantification. During the term of this rider the Company will prepare and submit a semi-annual report to the Commission listing the names and locations of customers receiving service hereunder and a statement of incentives provided to each customer during the reporting period. The report will also describe the basis used to qualify each customer added to the Company's economic development program during the reporting period.

e. Revenue Change: Company shall quantify the change in annual revenues from the Special Contract as the difference between the revenues that would be recovered from the general availability tariff compared to the revenues that alternatively would be recovered from the pricing provisions in the Special Contract. This quantification shall also include a separate adjustment for either the potential increase in sales that may occur without the Special Contract, or the potential loss of sales that may occur without the Special Contract. All significant assumptions shall be identified that affect this quantification.

f. Other Customer Benefits: Company shall quantify the benefits that it believes will accrue to other ratepayers from the Special Contract. All significant assumptions shall be identified that affect this quantification.

g. Other Economic Benefits to the Area: Company shall quantify the economic benefits to the state, metropolitan area, and/or local area that Company projects to be realized as a result of the Special Contract.

h. Documentation: Company shall provide references to each internal policy, procedure and practice that it has developed and used in its negotiation of the Special Contract and make available copies of said policies, procedures and practices.

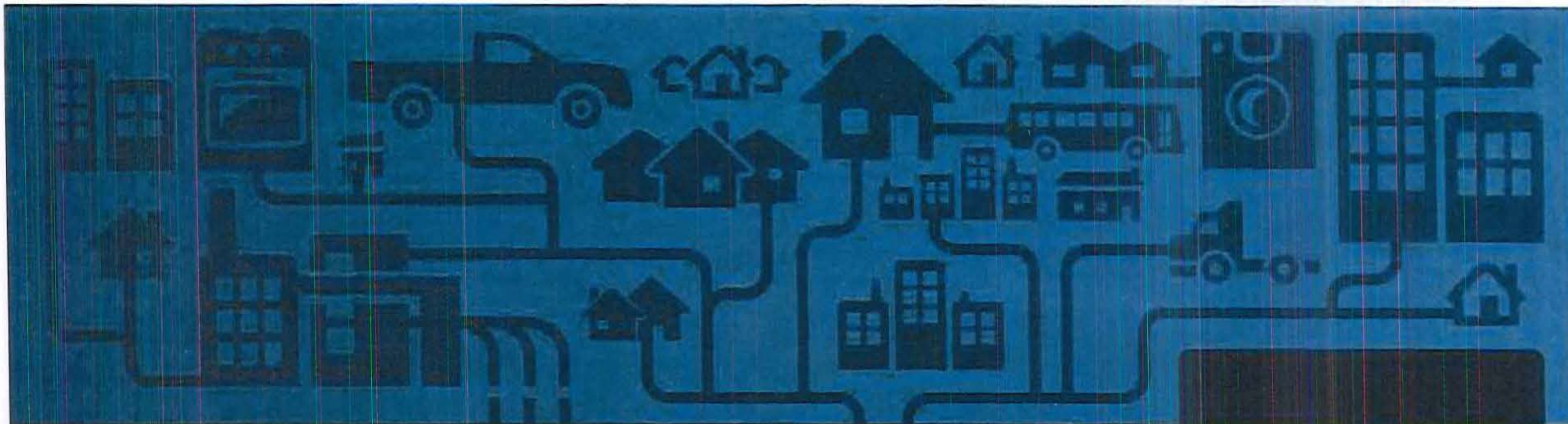
RULES AND REGULATIONS

38. Special Contract Rider – SCR (continued)

7. Other: Prior to any determination of the Company's revenue requirement for rate making purposes before the Commission, test year revenues shall be based on the actual revenues being received by the Company under the discounts being provided pursuant to this SCR, provided that the Commission approved the Special Contract or, if such approval was not sought, the Company substantiates in such rate case proceeding that the Special Contract was reasonable and in the public interest based on the information available at the time it was executed. The Company shall only be required to provide such substantiation if a party to such proceeding submits evidence explaining why that party believes the Special Contract was not reasonable and in the public interest at the time it was executed.

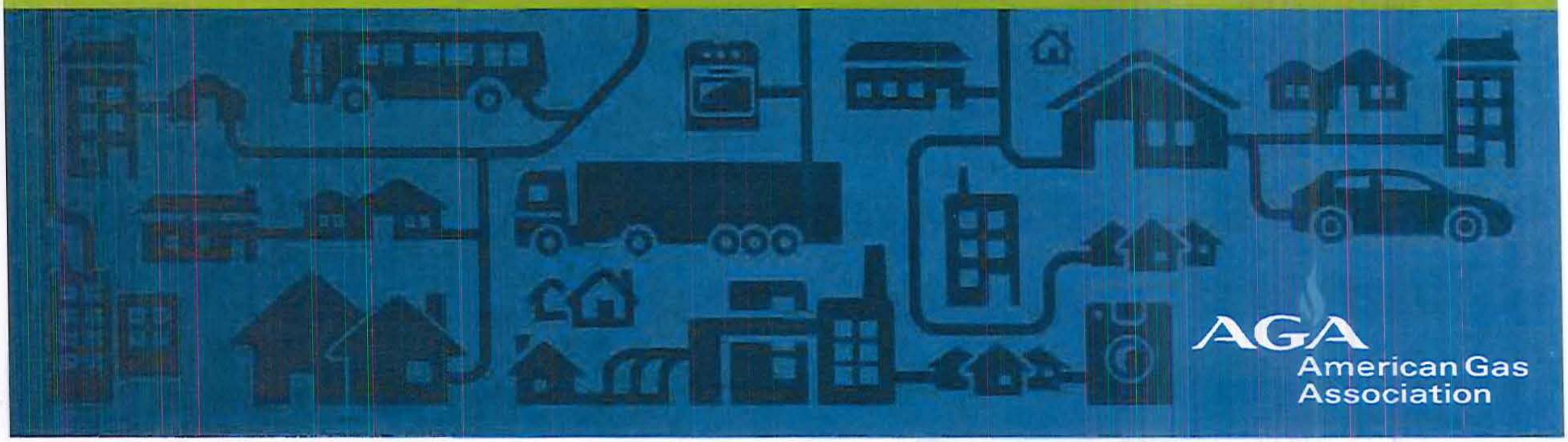
8. Adjustments and Surcharges: The rates hereunder are subject to adjustment as provided in the following schedules: " Infrastructure System Replacement Surcharge, Purchased Gas Adjustment/Actual Cost Adjustment Clause; Tax and License Rider

9. Regulations: Subject to Rules and Regulations filed with the Commission



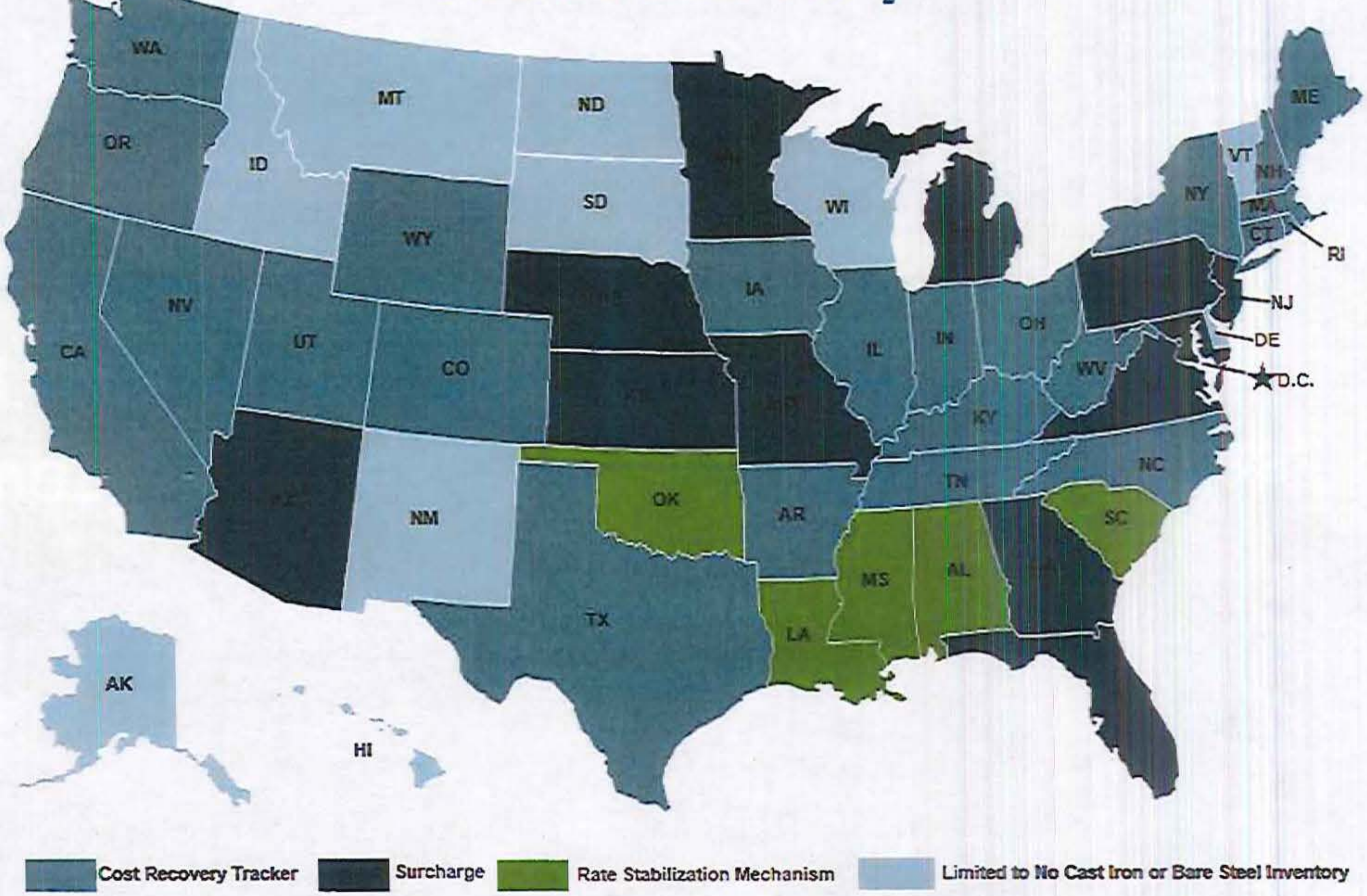
Innovative Rates, Non-Volumetric Rates, and Tracking Mechanisms: Current List

As of December 2016



AGA
American Gas Association

States with Accelerated Infrastructure Cost Recovery



Utilities with Full Infrastructure Cost Recovery Mechanisms

1. AL – Alabama Gas Company
2. AL – Mobile Gas Service
3. AR – Arkansas Oklahoma Gas
4. AR – SourceGas
5. AR – CenterPoint Energy
6. CA – San Diego Gas and Electric
7. CA – Southern California Gas
8. CA – Southwest Gas
9. CO – Public Service Co. of Colorado
10. CO – Atmos Energy
11. CO – SourceGas
12. CT – Connecticut Natural Gas
13. DC – Washington Gas
14. FL – Chesapeake Utilities
15. FL – Florida Public Utilities Company
16. FL – Florida City Gas
17. FL – TECO Peoples Gas
18. GA – Atlanta Gas Light
19. GA – Liberty Utilities
20. IL – Ameren Illinois
21. IL – NICOR Gas
22. IL – Peoples Gas
23. IN – Vectren North Indiana Gas
24. IN – Vectren South SIGECO
25. IN – NIPSCO
26. KS – Atmos Energy
27. KS – Black Hills
28. KS – Kansas Gas Service
29. KY – Atmos Energy
30. KY – Columbia Gas of Kentucky
31. KY – Delta Natural Gas
32. KY – Duke Energy Kentucky
33. LA – CenterPoint Energy
34. LA – Entergy Gulf States
35. MA—Berkshire Gas
36. MA – Columbia Gas of Massachusetts
37. MA – National Grid Massachusetts
38. MA – Eversource Energy
39. MA – Liberty Utilities
40. MA—Unitil
41. MD – Baltimore Gas and Electric
42. MD – Columbia Gas of Maryland
43. MD – Washington Gas
44. MI – Consumers Energy
45. MI – DTE
46. MI – SEMCO Energy
47. MN – Xcel Energy
48. MO – Ameren Missouri
49. MO – Liberty Utilities
50. MO – Laclede Gas
51. MO – Missouri Gas Energy
52. MS – Atmos Energy
53. MS – CenterPoint Energy
54. NC – Piedmont Natural Gas
55. NC – Public Service of North Carolina
56. NH – Liberty Utilities
57. NJ – New Jersey Natural
58. NJ – Elizabethtown Gas
59. NJ – Public Service Electric and Gas
60. NJ – South Jersey Gas
61. NV – Southwest Gas
62. OH – Columbia Gas of Ohio
63. OH – Dominion East Ohio
64. OH – Duke Energy
65. OH – Vectren Ohio
66. OK – CenterPoint Energy
67. OR – Avista Corp.
68. OR – NW Natural
69. PA – Columbia Gas of Pennsylvania
70. PA – Equitable Gas
71. PA – Peoples Gas Company
72. PA – Peoples TWP
73. PA – UGI Central Penn Gas
74. PA – UGI Penn Natural Gas
75. PA – PECO
76. PA – Philadelphia Gas Works
77. RI – National Grid Narragansett Gas
78. SC – Piedmont Natural Gas
79. SC – South Carolina Electric and Gas
80. TN – Atmos Energy
81. TN – Piedmont Natural Gas
82. TX – Atmos Energy
83. TX – CenterPoint Energy
84. TX – Texas Gas Service
85. UT – Questar Gas
86. VA – Atmos Energy
87. VA – Columbia Gas of Virginia
88. VA – Virginia Natural Gas
89. VA – Washington Gas
90. WA – Avista Corporation
91. WA – Puget Sound Energy, Inc.
92. WA – Cascade Natural Gas Company
93. WA – Northwest Natural Gas Company
94. WV – Mountaineer Gas Company
95. WV- Dominion Hope
96. WY– Black Hills

Limited and Pending Infrastructure Mechanisms

LIMITED – 3 States

1. AZ – Southwest Gas
2. ME – Northern Utilities
3. NY – Consolidated Edison
4. NY – Corning Natural Gas
5. NY – National Grid NYC
6. NY – National Grid Long Island
7. NY – National Grid Niagara Mohawk
8. NY – Orange and Rockland

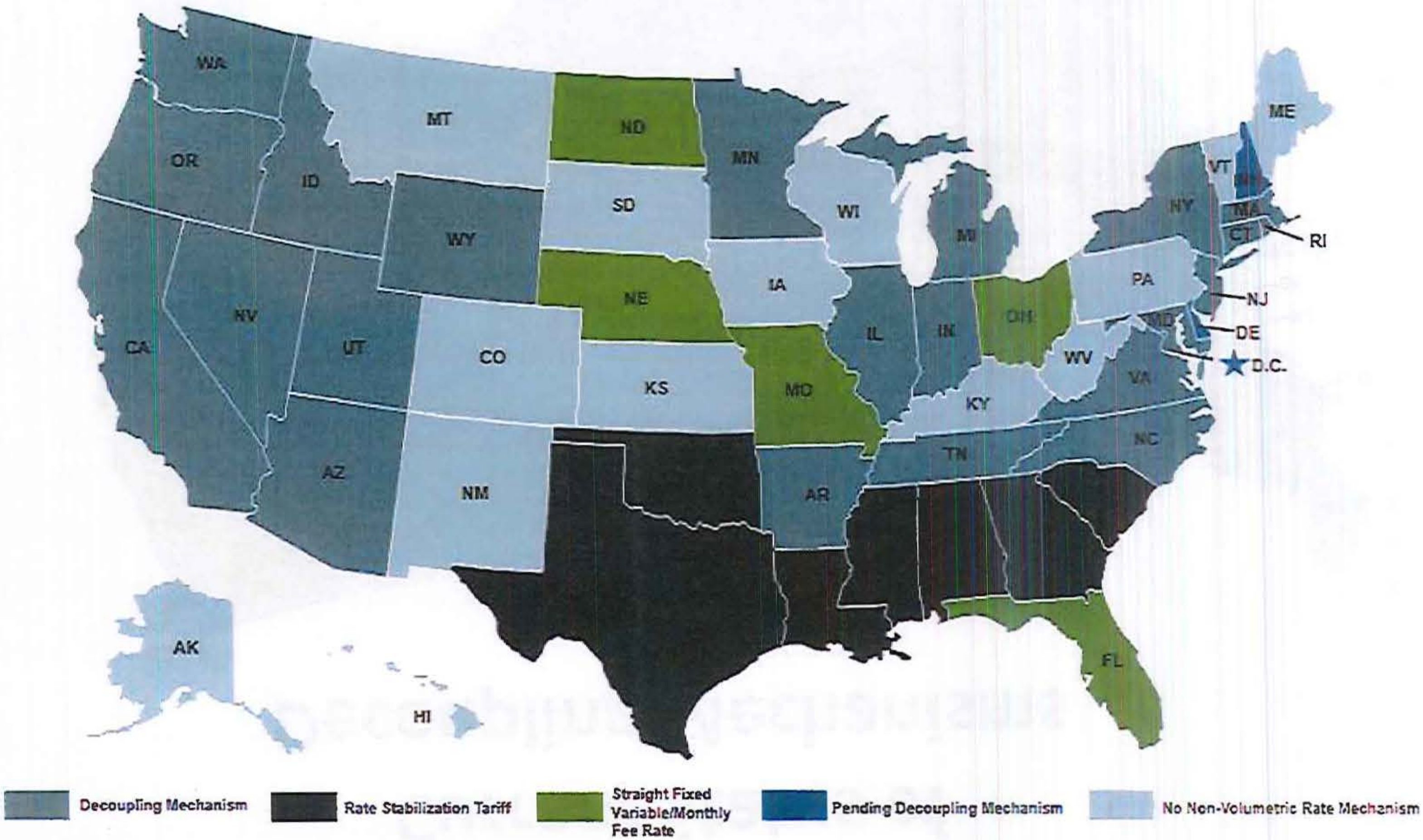
PENDING – 3 States

1. KS – All utilities
2. NJ – Elizabethtown Gas
3. NY – Consolidated Edison
4. NY – All utilities

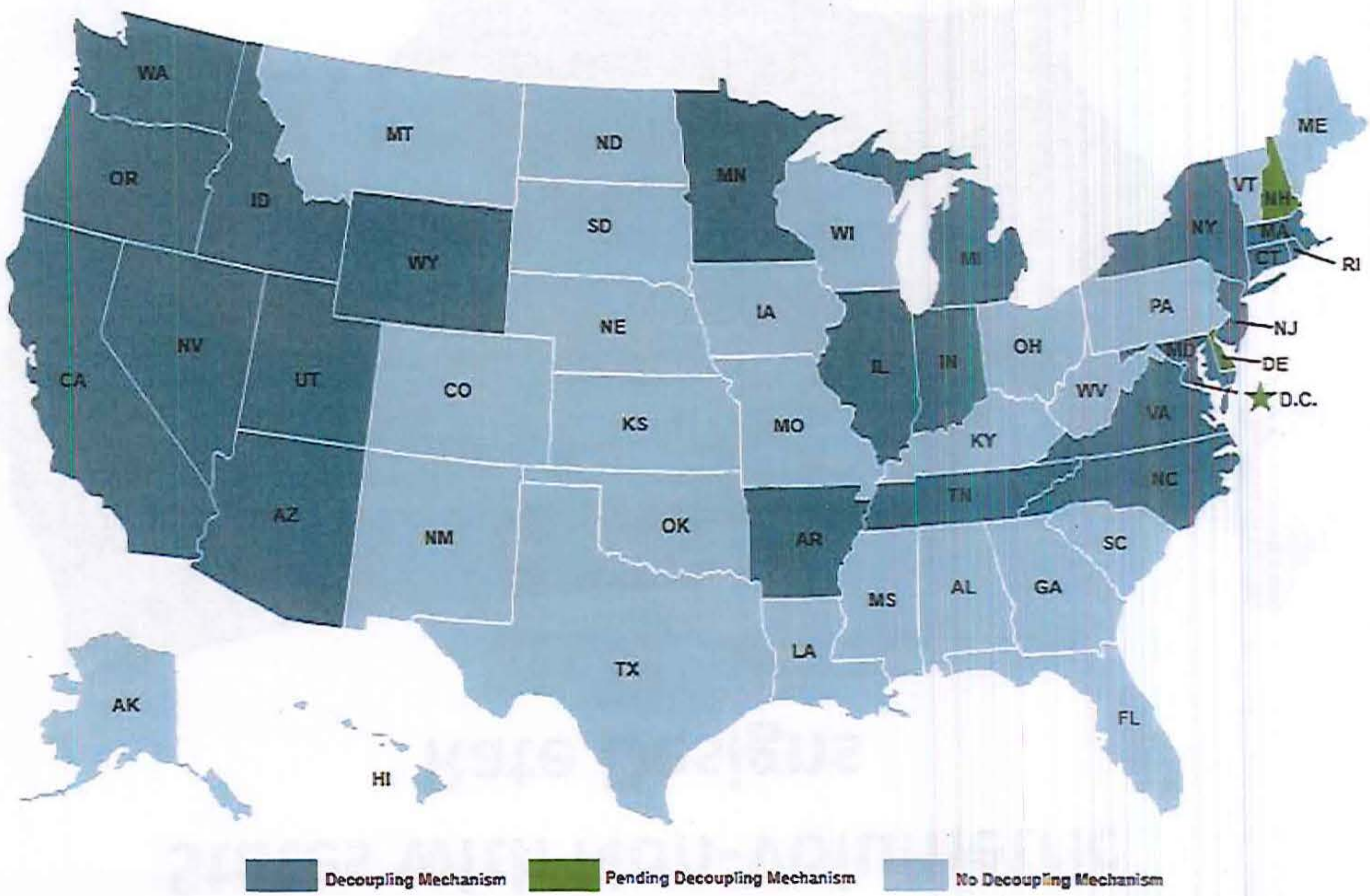
GENERIC RULINGS OR LEGISLATION – 3 States

1. Iowa – All utilities may apply
2. Nebraska – All utilities may apply
3. West Virginia – All utilities may apply

States with Non-Volumetric Rate Designs



Current Status of Decoupling Mechanisms



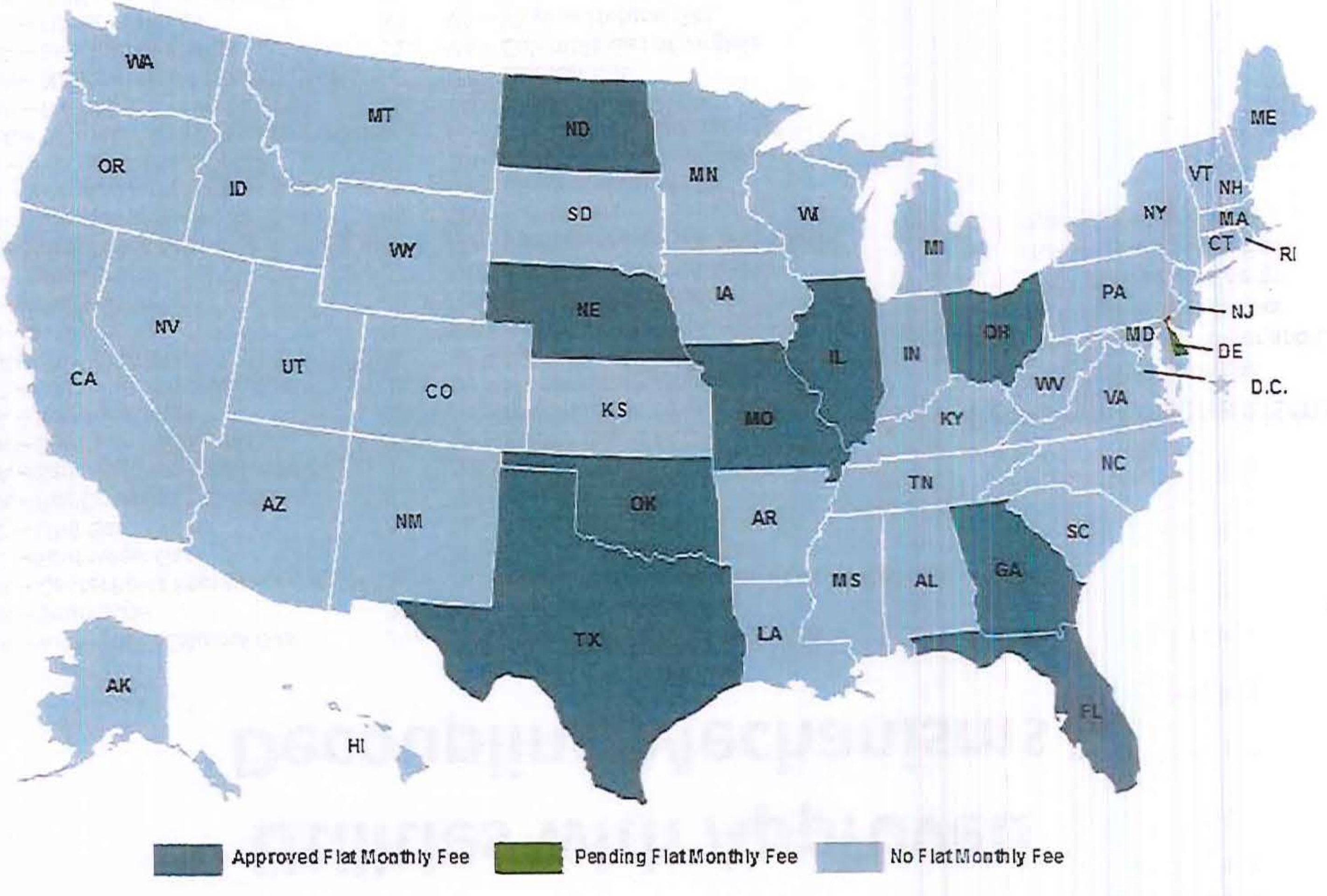
Utilities with Approved Decoupling Mechanisms

1. AR – Arkansas Oklahoma Gas
2. AR – SourceGas
3. AR – CenterPoint Energy
4. AZ – Southwest Gas
5. AZ – UNS Gas
6. CA – Pacific Gas and Electric
7. CA – San Diego Gas and Electric
8. CA – Southern California Gas
9. CA – Southwest Gas
10. CT – Connecticut Natural Gas
11. GA – Liberty Utilities
12. ID – Avista
13. IL – Ameren Illinois
14. IL – Peoples Gas
15. IL – North Shore Gas
16. IN- Citizens Energy Group
17. IN – Vectren North Indiana Gas
18. IN – Vectren South SIGECO
19. MA – Columbia Gas of Massachusetts
20. MA – Fitchburg Gas and Electric
21. MA – National Grid Massachusetts
22. MA – Eversource Energy
23. MA – Liberty Utilities
24. MD – Baltimore Gas and Electric
25. MD – Columbia Gas of Maryland
26. MD – Washington Gas
27. MI—Consumers Energy
28. MI – DTE
29. MN – CenterPoint Energy
30. MN – Minnesota Energy Resources
31. NC – Piedmont Natural Gas
32. NC – Public Service Company of North Carolina
33. NJ – New Jersey Natural Gas
34. NJ – South Jersey Gas
35. NV – Southwest Gas
36. NY – Corning Natural Gas
37. NY – National Grid NYC
38. NY – National Grid Long Island
39. NY – National Grid Niagara Mohawk
40. NY – National Fuel Distribution
41. NY – New York State Electric and Gas
42. NY – Orange and Rockland
43. NY – Rochester Gas and Electric
44. NY – Central Hudson Gas and Electric
45. OR – Avista Corp.
46. OR – Cascade Natural Gas
47. OR – Northwest Natural Gas
48. RI – National Grid Narragansett
49. TN – Chattanooga Gas
50. UT – Questar Gas
51. VA – Columbia Gas of Virginia
52. VA – Virginia Natural Gas
53. VA – Washington Gas
54. WA – Avista Corp.
55. WA – Cascade Natural Gas
56. WA – Puget Sound Energy
57. WY – SourceGas
58. WY – Questar Gas

Pending Mechanisms

1. DC – Washington Gas
2. DE – Delmarva Power and Light
3. ID – Intermountain Gas
4. MI – Consumers Energy
5. NH – Passed Legislation
6. VA – Washington Gas

Current Status of Flat Monthly Fee Rate Designs (SFV)



Utilities with Flat Monthly Fee Rate Designs (SFV)

Approved SFV

1. GA – Atlanta Gas Light – Individually determined monthly demand charge
2. MO – Missouri Gas Energy – Flat monthly fee
3. ND – Montana-Dakota Utilities
4. ND – Xcel Energy – Flat monthly fee
5. OH – Columbia Gas of Ohio – Flat monthly fee
6. OH – Dominion East Ohio – Flat monthly fee
7. OH – Duke Energy – Flat monthly fee
8. OH – Vectren Ohio – Flat monthly fee

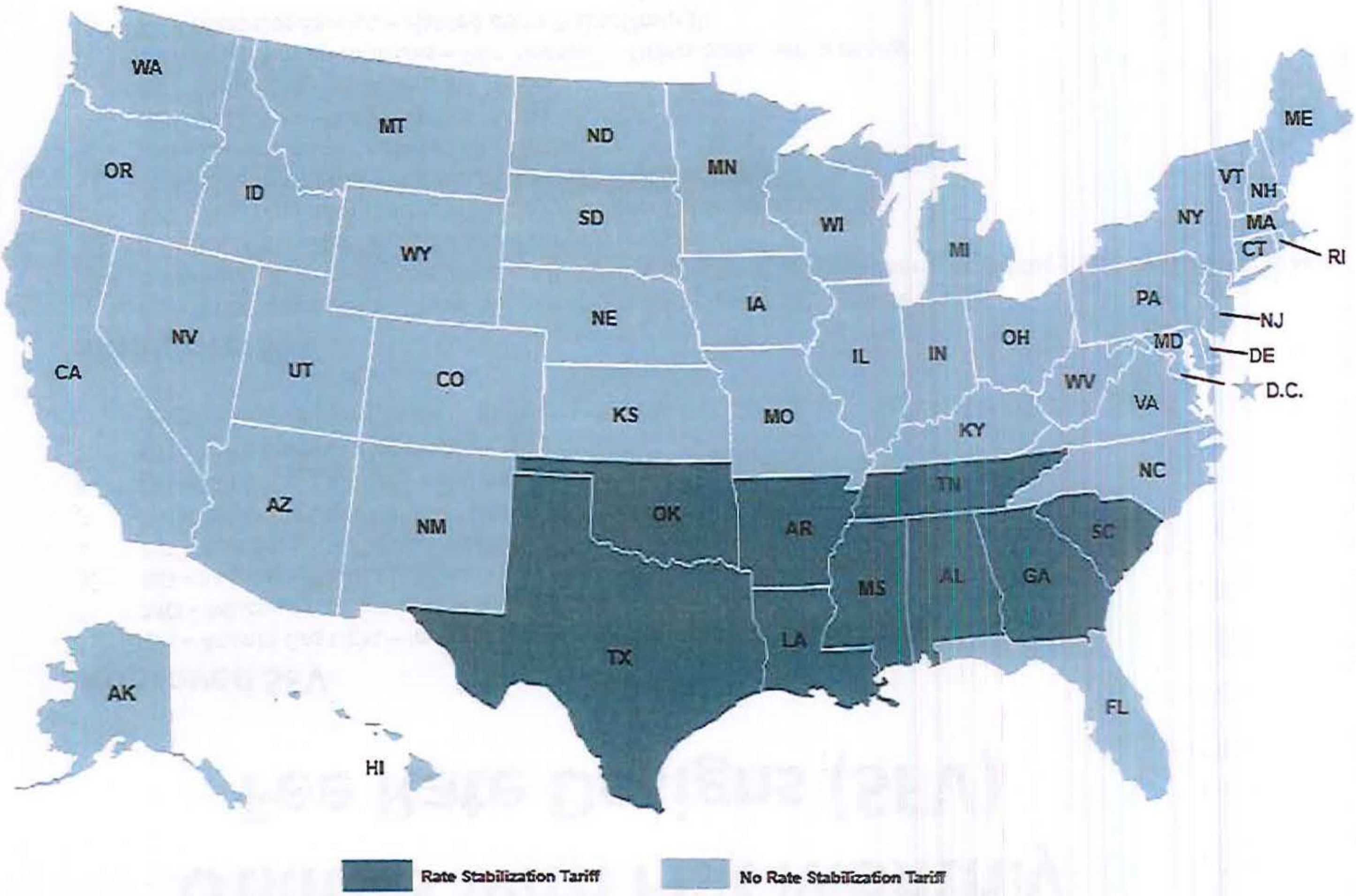
Similar to SFV

1. FL – TECO Peoples Gas – Three-tier monthly charge plus a small variable charge
2. IL - Ameren Illinois – 80% revenue for Residential and Small GS Customers per flat fee plus small variable charge
3. IL – Nicor Gas – Flat fee plus a small variable charge
4. MO – Ameren – Modified rate blocks for Residential Service customers
5. MO – Liberty Utilities – Flat fee plus a small variable charge
6. MO – Laclede Gas – Modified rate blocks
7. NE – Black Hills – Declining rate blocks
8. NE – SourceGas – Modified rate blocks
9. OK – Oklahoma Natural Gas – Two-tier plan – Offers customers a choice
10. TX – Texas Gas Service – Flat fee up to 200 ccf/month

Pending

1. DE – Delmarva Power and Light

Current Status of Rate Stabilization Tariffs



Current Status of Rate Stabilization Tariffs

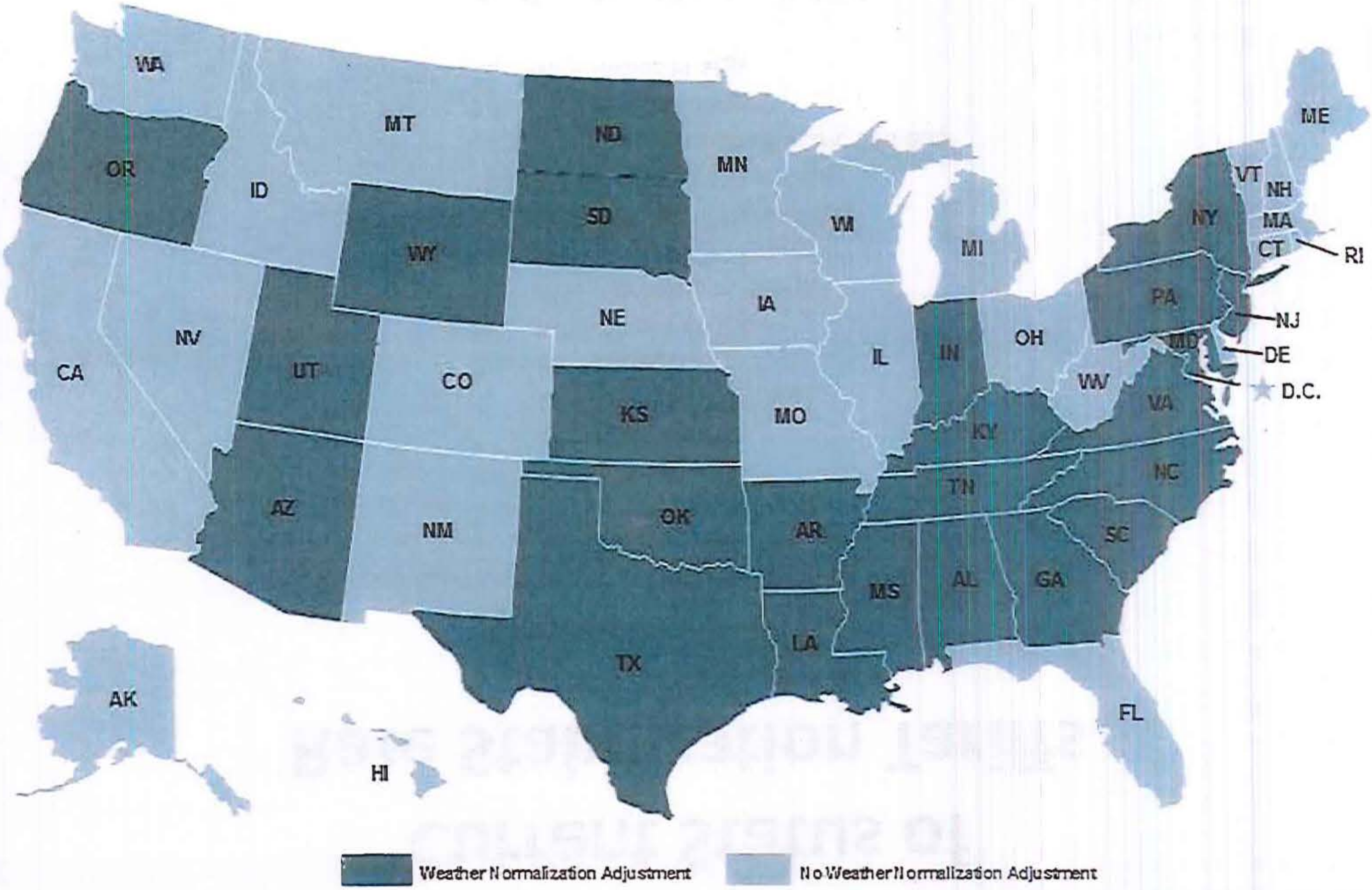
Approved

1. AL – Alabama Gas
2. AL – Mobile Gas
3. AR – CenterPoint Energy
4. GA – Liberty Utilities
5. LA – Atmos Energy
6. LA – CenterPoint Energy
7. LA – Entergy
8. MS – Atmos Energy
9. MS – CenterPoint Energy
10. OK – CenterPoint Energy
11. OK – Oklahoma Natural Gas
12. SC – Piedmont Natural Gas
13. SC – South Carolina Electric and Gas
14. TN – Atmos Energy
15. TX – Atmos Energy

Authorized by Legislation

1. Arkansas

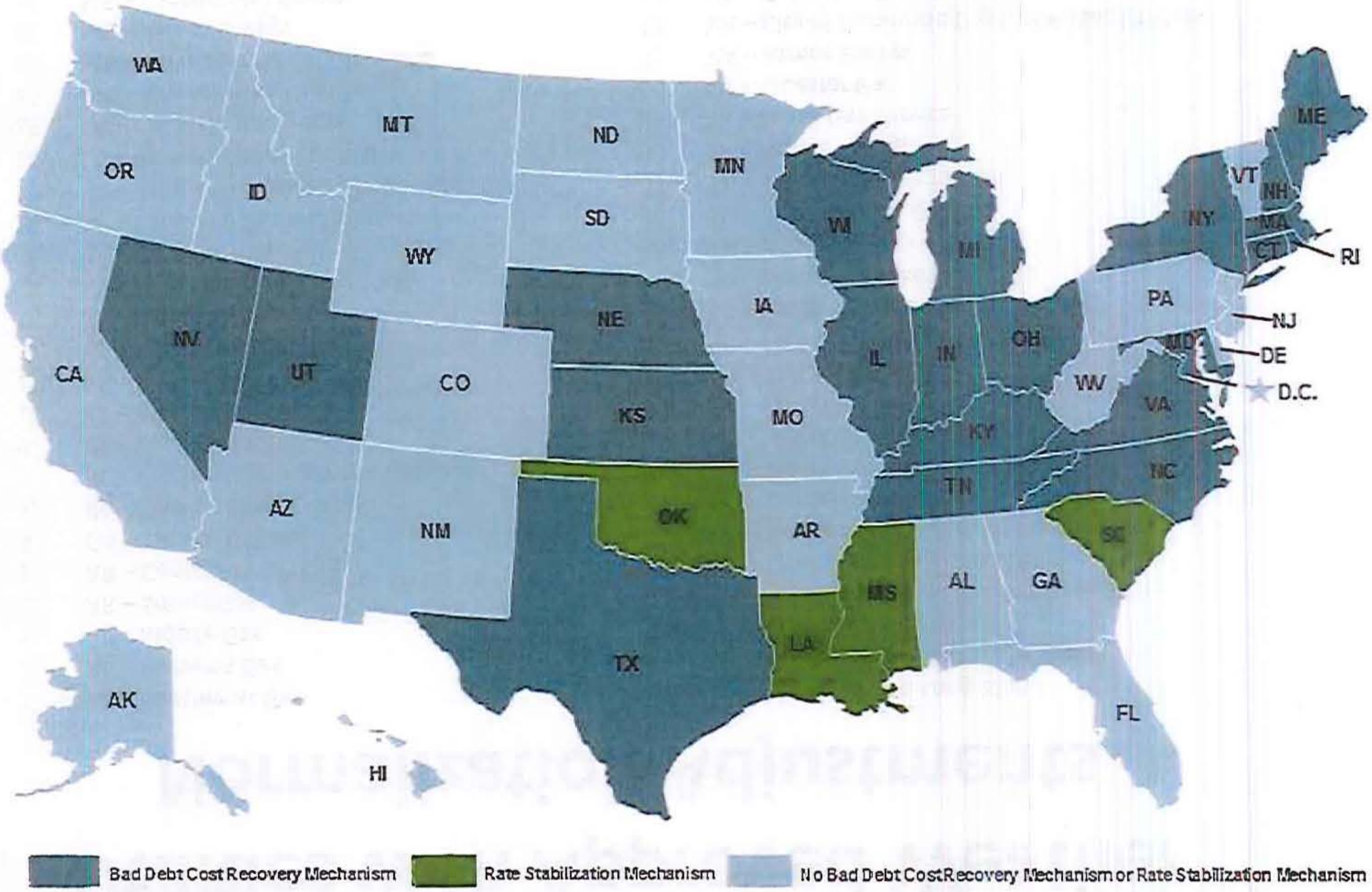
Current Status of Weather Normalization Adjustments



Utilities with Approved Weather Normalization Adjustments

1. AZ – Southwest Gas
2. AL – Alabama Gas
3. AL – Mobile Gas
4. AR – SourceGas
5. AR – CenterPoint Energy
6. GA – Liberty Utilities
7. IN – Citizens Energy Group
8. IN – Vectren North Indiana Gas
9. IN – Vectren South SIGECO
10. KS – Atmos Energy
11. KS – Black Hills
12. KS – Kansas Gas Service
13. KY – Atmos Energy
14. KY – Columbia Gas of Kentucky
15. KY – Delta Natural Gas
16. KY – Louisville Gas and Electric
17. LA – Atmos – Louisiana Gas Service
18. LA – Atmos – Trans Louisiana
19. LA – CenterPoint Energy
20. MD – Chesapeake Utilities
21. MD – Columbia Gas of Maryland
22. MS – Atmos Energy
23. MS – CenterPoint Energy
24. ND – Montana-Dakota Utilities
25. NJ – Elizabethtown Gas
26. NJ – New Jersey Natural Gas
27. NJ – Public Service Electric and Gas
28. NY – Central Hudson Gas and Electric
29. NY – Consolidated Edison
30. NY – National Fuel Gas Distribution
31. NY – National Grid Long Island
32. NY – National Grid Niagara Mohawk
33. NY – National Grid NYC
34. NY – New York State Electric and Gas
35. NY – Orange and Rockland Utilities
36. NY – Rochester Gas and Electric
37. OK – CenterPoint Energy
38. OK – Oklahoma Natural Gas
39. OR – Northwest Natural Gas
40. PA – Columbia Gas of Pennsylvania
41. PA – Philadelphia Gas Works
42. SC – Piedmont Natural Gas
43. SC – South Carolina Electric and Gas
44. SD – Montana-Dakota Utilities
45. TN – Atmos Energy
46. TN – Chattanooga Gas
47. TN – Piedmont Natural Gas
48. TX – Atmos Energy
49. TX – Texas Gas Service
50. UT – Questar Gas
51. VA – Atmos Energy
52. VA – City of Richmond Dept. of Public Utilities
53. VA – Columbia Gas of Virginia
54. VA – Roanoke Natural Gas
55. VA – Southwestern Virginia Natural Gas
56. VA – Virginia Natural Gas
57. VA – Washington Gas

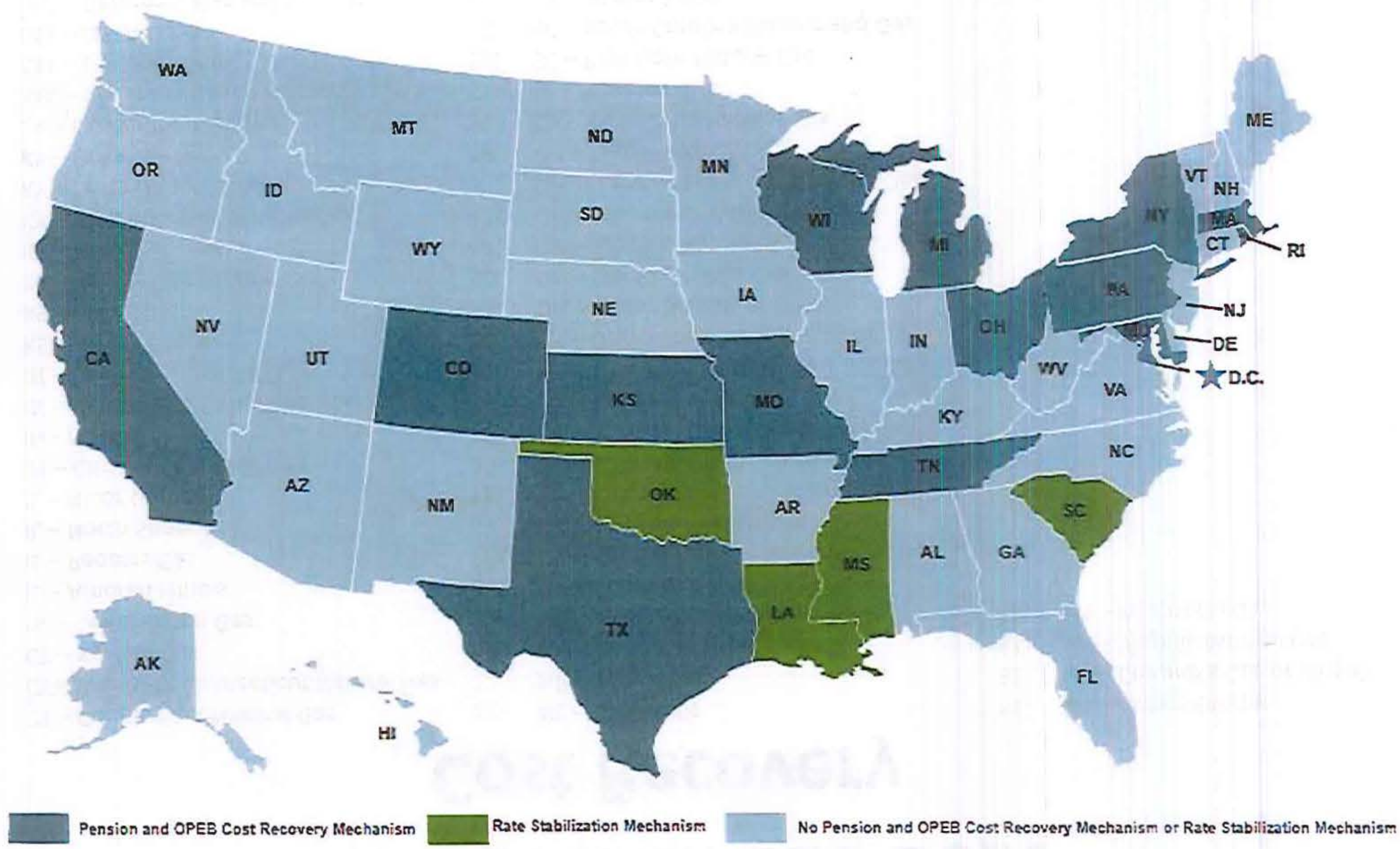
Current Status of Bad Debt Cost Recovery



Utilities with Bad Debt Cost Recovery

1. CT – Connecticut Natural Gas
2. CT – Southern Connecticut Natural Gas
3. CT – Yankee Gas
4. DC – Washington Gas
5. IL – Ameren Illinois
6. IL – Peoples Gas
7. IL – North Shore Gas
8. IL – Nicor Gas
9. IN – Citizens Energy Group
10. IN - NIPSCO
11. IN – Vectren North Indiana Gas
12. IN – Vectren South SIGECO
13. KS – Atmos Energy
14. KS – Black Hills
15. KS – Kansas Gas Service
16. KY – Atmos Energy
17. KY – Columbia Gas of Kentucky
18. KY – Delta Natural Gas
19. KY – Duke Energy
20. LA – CenterPoint Energy
21. MA – Columbia Gas of Massachusetts
22. MA – National Grid
23. MA – NSTAR Gas
24. MD – Baltimore Gas and Electric
25. MD – Washington Gas
26. ME – Northern Utilities
27. MI – DTE
28. MI – Michigan Gas Utilities
29. MS – CenterPoint Energy
30. NC – Piedmont Natural Gas
31. NE – Black Hills
32. NE – SourceGas
33. NH – Liberty Utilities
34. NH – Northern Utilities
35. NV – Southwest Gas
36. NY – Central Hudson Gas and Electric
37. NY – Consolidated Edison
38. NY – National Fuel Gas Distribution
39. NY – National Grid Long Island
40. NY – National Grid Niagara Mohawk
41. NY – National Grid NYC
42. NY – New York State Electric and Gas
43. NY – Orange and Rockland Utilities
44. OH – Columbia Gas of Ohio
45. OH – Dominion East Ohio
46. OH – Eastern Natural Gas
47. OH – Pike Natural Gas
48. OH – Vectren Energy Delivery of Ohio
49. OK – CenterPoint Energy
50. OK – Oklahoma Natural Gas
51. RI – National Grid
52. SC – Piedmont Natural Gas
53. SC – South Carolina Electric and Gas
54. TN – Atmos Energy
55. TN – Chattanooga Gas
56. TN – Piedmont Natural Gas
57. TX – Atmos Energy
58. TX – Texas Gas Service
59. UT – Questar Gas
60. VA – Washington Gas
61. VA – Atmos Energy
62. VA – Columbia Gas of Virginia
63. VA – Virginia Natural Gas
64. WI – Wisconsin Gas

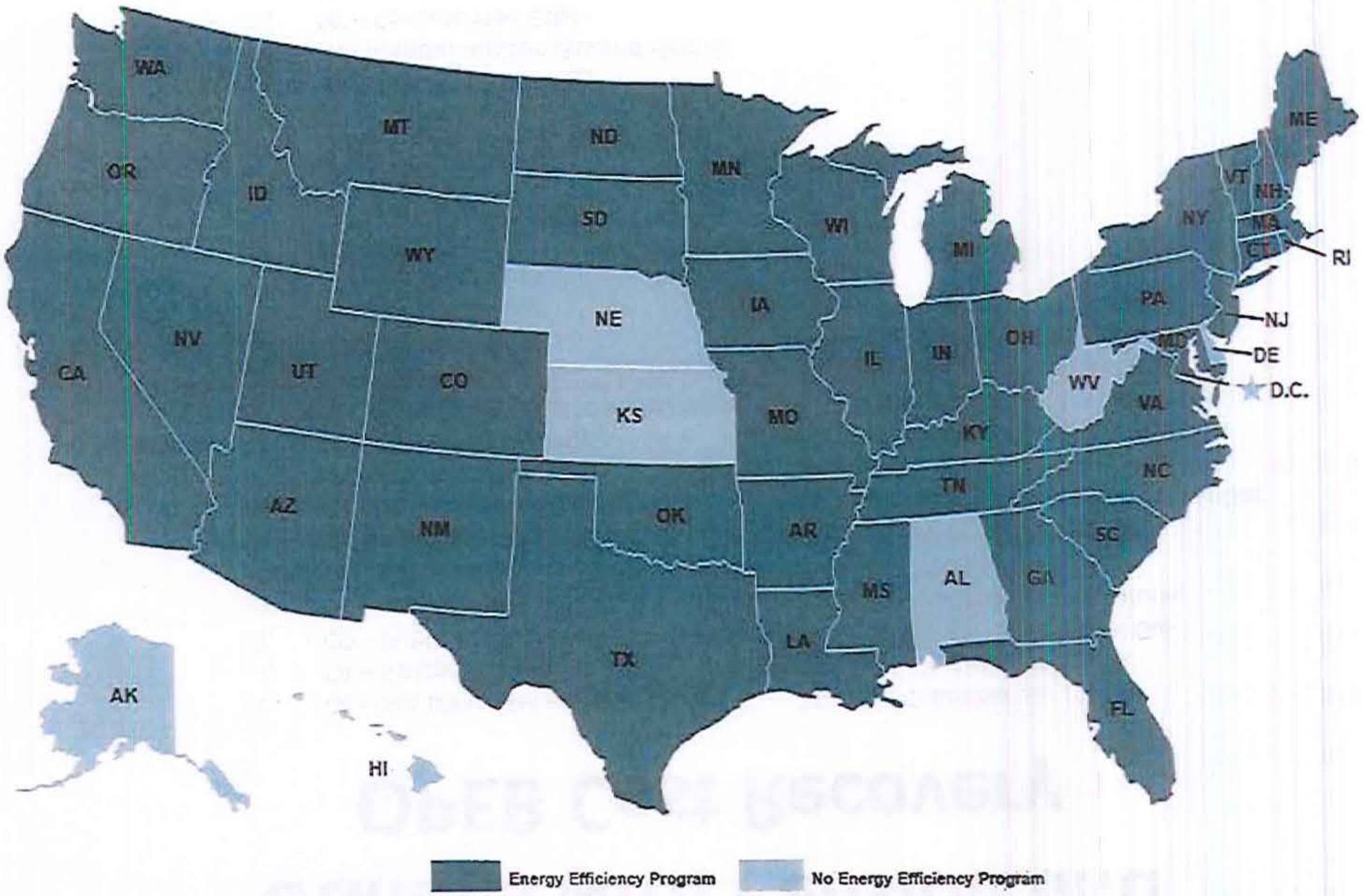
Current Status of Pension and OPEB Cost Recovery



Utilities with Pension and OPEB Cost Recovery

1. CA – San Diego Gas and Electric
2. CA – Southern California Gas
3. CO – Public Service Company of CO (Xcel)
4. DC – Washington Gas
5. KS – Atmos Energy
6. KS- Black Hills
7. KS – Kansas Gas Service
8. LA – Atmos Energy
9. LA – CenterPoint Energy
10. MA – Columbia Gas of Massachusetts
11. MA – Fitchburg Gas and Electric Light Co.
12. MA – National Grid
13. MA – NSTAR Gas Co.
14. MD – Baltimore Gas and Electric Co.
15. MI – DTE
16. MO – Ameren Missouri
17. MO – Laclede Gas
18. MO – Missouri Gas Energy
19. MS – Atmos Energy
20. MS – CenterPoint Energy
21. NY – Central Hudson Gas and Electric
22. NY – Consolidated Edison
23. NY – Orange and Rockland Utilities
24. NY – National Grid NYC
25. OH – Columbia Gas of Ohio
26. OK – CenterPoint Energy
27. OK – Oklahoma Natural Gas
28. PA – Philadelphia Gas Works
29. RI – National Grid
30. SC –Piedmont Natural Gas
31. SC – South Carolina Electric and Gas
32. TN – Piedmont Natural Gas
33. TX – Atmos Energy
34. TX – CenterPoint Energy
35. WI – Wisconsin Power and Light

Current Status of Natural Gas Energy Efficiency Programs



Utilities with Natural Gas Energy Efficiency Programs

1. AR – Arkansas Oklahoma Gas
2. AR – SourceGas
3. AR – CenterPoint Energy
4. AZ – Southwest Gas
5. CA – Pacific Gas and Electric
6. CA – San Diego Gas and Electric
7. CA – Southern California Gas
8. CA – Southwest Gas
9. CO – Atmos Energy
10. CO – Black Hills Energy
11. CO – Colorado Natural Gas
12. CO – SourceGas
13. CO – Public Service Co. of Colorado
14. CT – Connecticut Natural Gas
15. CT – Southern Connecticut Natural Gas
16. CT – Yankee Gas Service
17. FL – TECO Peoples Gas
18. GA – Atlanta Gas Light
19. IA – Liberty Utilities
20. IA – Black Hills Energy
21. IA – Interstate Power and Light
22. IA – MidAmerican Energy
23. IN – Citizens Energy Group
24. IN – NIPSCO
25. IN – Vectren North Indiana Gas
26. IN – Vectren South SIGECO
27. ID – Avista Utilities
28. ID – Intermountain Gas
29. IL – Ameren Illinois
30. IL – MidAmerican Energy
31. IL – Nicor Gas
32. IL – North Shore Gas
33. IL – Peoples Gas
34. KY – Atmos Energy
35. KY – Columbia Gas of Kentucky
36. KY – Delta Natural Gas
37. KY – Duke Energy Kentucky
38. KY – Louisville Gas and Electric
39. LA – Atmos Energy
40. LA – CenterPoint Energy
41. MA – Columbia Gas of Massachusetts
42. MA – Berkshire Gas
43. MA – Fitchburg Gas and Electric Light
44. MA – Liberty Utilities
45. MA – National Grid Massachusetts
46. MA – NSTAR Gas and Electric
47. MD – Baltimore Gas and Electric
48. MD – Columbia Gas of Maryland
49. MD – Washington Gas
50. ME – Northern Utilities
51. MI – Consumers Energy
52. MI – DTE
53. MI – Michigan Gas Utilities
54. MN – CenterPoint Energy
55. MN – Great Plains Natural Gas
56. MN – Interstate Power and Light
57. MN – Minnesota Energy Resources
58. MN – Xcel Energy
59. MO – Ameren
60. MO – Liberty Utilities
61. MO – Empire Natural Gas
62. MO – Laclede Gas
63. MO – Missouri Gas Energy
64. MS – Atmos Energy
65. MS – CenterPoint Energy
66. MT – Montana-Dakota Utilities
67. NC – Piedmont Natural Gas
68. NC – Public Service Co. of NC
69. ND – Montana-Dakota Utilities
70. NH – Liberty Utilities
71. NH – Northern Utilities
72. NJ – Elizabethtown Gas
73. NJ – New Jersey Natural Gas
74. NJ – Public Service Electric and Gas
75. NJ – South Jersey Gas
76. NM – New Mexico Gas
77. NV – NV Energy
78. NV – Southwest Gas
79. NY – Central Hudson Gas and Electric
80. NY – Consolidated Edison
81. NY – National Fuel Gas
82. NY – National Grid NY
83. NY – National Grid Long Island
84. NY – National Grid Niagara Mohawk
85. NY – Orange and Rockland Utilities
86. NY – St. Lawrence Gas
87. OH – Columbia Gas of Ohio
88. OH – Dominion East Ohio
89. OH – Duke Energy
90. OH – Vectren Energy Delivery of Ohio

Utilities with Natural Gas Energy Efficiency Programs (Cont.)

91. OK – CenterPoint Energy
92. OK – Oklahoma Natural Gas
93. OR – Avista Utilities
94. OR – Cascade Natural Gas
95. OR – Northwest Natural Gas
96. PA – Columbia Gas of Pennsylvania
97. PA – Equitable Gas
98. PA – PECO
99. PA – Peoples Natural Gas
100. PA – Philadelphia Gas Works
101. PA – UGI Central Penn Gas
102. PA – UGI Penn Natural Gas
103. PA – UGI Utilities
104. RI – National Grid
105. SC – Piedmont Natural Gas
106. SC – South Carolina Electric and Gas
107. SD – MidAmerican Energy
108. SD – Montana-Dakota Utilities
109. TN – Chattanooga Gas
110. TX – Atmos Energy
111. TX – Texas Gas Service
112. UT – Questar Gas
111. VA – Columbia Gas of Virginia
112. VA – Virginia Natural Gas
113. VA – Washington Gas
114. VT – Vermont Gas Systems
115. WA – Avista Utilities
116. WA – Cascade Natural Gas
117. WA – Northwest Natural Gas
118. WA – Puget Sound Energy
119. WI – City Gas
120. WI - Madison Gas And Electric
121. WI – Midwest Natural Gas
122. WI – St. Croix Valley Natural Gas
123. WI – Superior Water, Light and Power
124. WI – We Energies
125. WI – Wisconsin Light and Power
126. WI – Wisconsin Public Service
127. WI – Xcel Energy
128. WY – Montana-Dakota Utilities
129. WY – Questar Gas

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Laclede Gas Company's Request to Increase its Revenues for Gas Service	)))	File No. GR-2017-0215
In the Matter of Laclede Gas Company d/b/a Missouri Gas Energy's Request to Increase its Revenues for Gas Service	)))	File No. GR-2017-0216

AFFIDAVIT

STATE OF MISSOURI)
) SS.
CITY OF ST. LOUIS)

Scott A. Weitzel, of lawful age, being first duly sworn, deposes and states:

1. My name is Scott A. Weitzel. I am Manager, Tariffs and Rate Administration for Laclede Gas Company. My business address is 700 Market St., St Louis, Missouri, 63101.

2. Attached hereto and made a part hereof for all purposes is my surrebuttal testimony on tariffs and rate design on behalf of Laclede Gas Company and MGE.

3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my knowledge and belief.

Scott A. Weitzel

Subscribed and sworn to before me this 20 day of NOVEMBER 2017.

Marcia A. Spangler
Notary Public

MARCIA A. SPANGLER
Notary Public - Notary Seal
STATE OF MISSOURI
St. Louis County
My Commission Expires: Sept. 24, 2018
Commission # 14630361