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** Tariff No. YG-2017-0195
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** Tariff No. YG-2017-0196

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. My business address is 700 Market Street, St. Louis, Missouri 63101; and I am the Manager, Tariffs and Rate Administration for Spire Missouri Inc., formerly known as Laclede Gas Company ("LAC"). I have previously submitted Direct, Rebuttal, and Surrebuttal testimony in this case.

2. I have reviewed Staff's inclining block rate worksheets submitted during the true up hearing on January 3 and marked as Exhibit 284. Below are my comments regarding rate impacts.

3. Staff's summary on page 2 compares bill impacts between LAC's current rates and the proposed new rate design. However, in order to isolate the effect of inclining block distribution rates, PGA rates should be held constant. On page 2, the "Current Bill" is calculated using the June 2017 PGA rate of 54.7 cents. The proposed "Incline Alt." uses the November 2016 PGA rate of 47.8 cents. Upon changing the PGA rate of both rate designs to LAC's current November 2017 rate of 46.6 cents, the Incline alternative was actually higher than the current rate design. For example, the most populous usage category in January tops out at 150 ccf. The

Incline alternative with the $26 customer charge is $4.69 higher than the current rate design, rather than ($5.72) lower. For the $22 customer charge, the Incline alternative is $9.81 higher than the current rate design, rather than ($.60) lower. As proposed in this exhibit, using the updated PGA rates and rough estimates, at the $22 charge, January bills increase for the highest 70% users, decrease for the lowest 10% users, and stay roughly the same for the 20% in between. For the $26 charge, bills increase slightly for the lowest 2% users, decrease for the next 25%, and then increase for all customers of higher usage.

4. There were discussions at the true up hearing about inclining block rates in the summer time only. Staff's study shows that this results in higher charges for low use customers May through October because of the higher customer charge. Aligning PGA rates exacerbates this effect.

5. As the Company has stated on multiple occasions in connection with a revenue stabilization rider or weather normalization adjustment rider, the Company is open to exploring different rate designs.

6. We have previously noted that in order to moderate bill impacts, moving from a declining block rate to a flat rate may be a good first step before moving to an inclining block rate. A flat volumetric charge and a lower customer charge would reduce bills for low use customers. This can be seen in LAC's Cost of Service Model filed with its direct testimony.

7. We would also note that the rate designs in Exhibit 284 have the same block size for both summer and winter (30 in one example; 50 in the other). Given the varied seasonal usage characteristics, it may be advisable to have different block sizes for summer versus winter.

8. I hereby swear and affirm that the information contained herein is true and correct to the best of my knowledge and belief.

Scott A. Weitzel

Subscribed and sworn to before me this 5th day of January, 2018.

Notary Public

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