

Exhibit No.: _____

Issue: Safety

Witness: David Moody

Exhibit Type: Surrebuttal

Sponsoring Party: Summit Natural Gas of Missouri, Inc.

Case No.: GR-2014-0086

Date: August 8, 2014

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO. GR-2014-0086

SURREBUTTAL TESTIMONY

OF

DAVID MOODY

ON BEHALF OF

SUMMIT NATURAL GAS OF MISSOURI, INC.

Jefferson City, Missouri

August, 2014

Summit Exhibit No. 9
Date 8-19-14 Reporter XF
File No. GR-2014-0086

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OF
DAVID MOODY**

SUMMIT NATURAL GAS OF MISSOURI, INC.

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SURREBUTTAL TESTIMONY

DAVID MOODY

SUMMIT NATURAL GAS OF MISSOURI, INC.

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. David Moody, 215 Gage Dr, Suite G, Hollister, MO 65672.

3 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

4 A. I am employed by Summit Natural Gas of Missouri, Inc. (SNG) as its President.

5 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY AND SCHEDULES IN**
6 **THIS CASE?**

7 A. No.

8 **Q. PLEASE STATE YOUR EDUCATIONAL BACKGROUND AND YOUR**
9 **RELEVANT BUSINESS EXPERIENCE.**

10 A. Please see Schedule DM-1.

11 **Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?**

12 A. The purpose of my surrebuttal testimony is to respond to the rebuttal testimony of
13 Missouri Propane Gas Association (MPGA) Witness Brian Brooks, as it relates to
14 safety issues.

15 **RESPONSE TO MPGA WITNESS BROOKS' TESTIMONY**

16 **Q. IN HIS REBUTTAL TESTIMONY ON PAGE 4, LINES 15-22, AND PAGE 5,**
17 **LINES 1-5, MPGA WITNESS BROOKS DESCRIBES A CONVERSION ISSUE**
18 **WHERE HE ALLEGES THAT SNG REPRESENTATIVES IMPROPERLY**

1 **CONVERTED A VENT FREE APPLIANCE. MR. BROOKS FURTHER**
2 **ALLEGES THAT HE HAD A BRIEF INFORMAL CONVERSATION “WITH THE**
3 **PRESIDENT OF SNG, DAVID MOODY” REGARDING THIS ISSUE AND THAT**
4 **MR. MOODY TOLD HIM THAT SNG “USED PROPER PILOTS, ORIFICES AND**
5 **FOLLOWED MANUFACTURE GUIDELNES.” ARE YOU THE DAVE MOODY**
6 **TO WHICH MR. BROOKS REFERS?**

7 A. I assume that I am.

8 **Q. DO YOU AGREE THAT SNG USES PROPER PILOTS, ORIFICES AND**
9 **FOLLOWED MANUFACTURE GUIDELNES IN CONVERSION ACTIVITIES?**

10 A. I do. Additionally, I have included the latest order of 150 natural gas pilot oxygen
11 depletion sensors (ODS), see Surrebuttal Schedule DM-2. SNG has been ordering
12 and installing proper conversion parts on all conversions. Mr. Brooks presents in
13 exhibit 4 a document from AO Smith Water Products Company, that the practice of
14 converting their water heating products from propane to natural gas is acceptable.

15 **Q. MR. BROOKS REFERENCES FACTS CONTAINED IN AN “EXHIBIT 3”**
16 **ATTACHED TO HIS TESTIMONY AS THE BASIS FOR HIS ALLEGATIONS.**
17 **ARE YOU ABLE TO ADDRESS THAT SPECIFIC SITUATION?**

18 A. I am not. The name and address of the person associated with those allegations
19 has been labeled “Highly Confidential” by the MPGA. Therefore, I am not allowed
20 to review that information and I cannot confirm exactly what actions were, or were
21 not, taken by SNG technicians at that customer’s address.

1 Q. WHAT STEPS DOES SNG FOLLOW IN REGARD TO CONVERSIONS AS A
2 MATTER OF PRACTICE?

3 A. SNG follows a combination of local, state and international codes and
4 recommended conversion practices.

5 Q. IN HIS REBUTTAL TESTIMONY ON PAGE 5, LINES 7-23, MPGA WITNESS
6 BROOKS STATES THAT IT IS "ANTI-COMPETITIVE" TO PROHIBIT THE USE
7 OF BOTH PROPANE AND NATURAL GAS ON THE SAME PREMISES. DO
8 YOU AGREE WITH THIS VIEWPOINT?

9 A. No, I do not agree with Mr. Brooks' statement. This is purely a safety issue.
10 Having propane and natural gas feeding the same home or small business is
11 inherently unsafe. Often firefighters shut off the source of gas they see. They
12 have no idea that there is another gas supply feeding a structure and don't realize
13 that there exists a dangerous situation. Many jurisdictions require special permits
14 to do so. As an example, attached as Surrebuttal Schedule DM-3 is a State of
15 Massachusetts Special Permission Gas Dual Fuel Request Application Form that
16 requires permission from the State and from a Fire Department authority.

17 Q. HOW LONG HAS THE CURRENT TARIFF PROVISION PROHIBITING SUCH
18 DUAL FUEL USAGE BEEN PLACE?

19 A. As Mr. Brooks indicates, this prohibition has been in place in the Southern
20 Missouri Natural Gas legacy system for eleven years (or since 2003).

21 Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?

1 A. Yes

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Summit Natural Gas of)
Missouri Inc.'s Filing of Revised Tariffs) Case No. GR-2014-0086
To Increase its Annual Revenues For)
Natural Gas Service)

AFFIDAVIT OF DAVID MOODY

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

David Moody, being first duly sworn on his oath, states:


1. My name is David Moody and I work in Hollister, Missouri and I am employed as the President of Summit Natural Gas of Missouri.

2. Attached hereto and made a part of hereof for all purposes is my Surrebuttal Testimony on behalf of Summit Natural Gas of Missouri, Inc. consisting of 4 pages, all of which have been prepared in written form for introduction into evidence in the above-referenced docket.

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


David Moody

Subscribed and sworn to before me this 6th day of August, 2014.


Notary Public

My commission expires: 10-17-2016

CARLA RICHARDSON
Notary Public - State of Missouri
My Commission Expires October 17, 2016
Taney County
Commission #12405735

Statement of Qualifications

David Moody

I currently hold the position of President, Summit Natural Gas of Missouri, Inc.

I began my natural gas career in March 1978, in an entry level position with Peoples' Natural Gas in Garden City, Kansas. My early experience was as a technician performing many customer service activities, including all sizes of residential, commercial and industrial services, and utility compliance activities. I quickly advanced in this career entering management in 1985. I continued my management career at Peoples until 1996 when I became a sales manager with Aquila Energy Marketing. In 1998, I was appointed Director of Operations for Peoples Natural Gas in Colorado.

In 2001, I joined Summit Utilities, Inc. in Colorado as a District Manager in the Northern District. At the time, Summit served 1,300 customers. And I helped it grow to over 20,000 customers including new properties in Missouri.

In 2005, I assumed duties as Vice President of Operations which included supervision of all the Customer Service and Field Operations personnel in Colorado and Missouri, setting safety principles, serving as a member of the gas purchasing committee, and serving as compliance and policy lead. I have helped create new O&M, safety, emergency, transmission/distribution integrity, public awareness, and Demand Side Management plans as well as recommending changes to applicable tariffs.

MASTER

Distributors • Parts • Products

Scanned 1/30/14
Customer Invoice

Po Box 141727
 Grand Rapids, MI 49514

Date	Invoice #
1/27/2014	PF100065345

Bill To
 Summit Natural Gas of Missouri Inc
 Troy Palmer
 7810 Shaffer Parkway Suite 120
 Littleton, Colorado 80127

PAID
 01/27/2014

Ship To
 Summit Natural Gas of Missouri Inc
 Troy Palmer
 14108 N Hwy 5
 -
 Sunrise Beach, Missouri 65079

Time	Rep	Customer Phone	Customer Fax	P.O. Number	Customer E-mail
	OPF	720-440-1056			tpalmer@summitutilitiesinc.com

**Heating Parts and Heating Products must be installed by a qualified installer,
 (HVAC license required for gas and LP installations) any other installation will void warranty.**

Item #	Description	Location	Quantity	Price Each	Amount
103779-01	DESA PARTS: NG PILOT ODS ASSEMBLY (NG8218) (replaces PP231)		150	58.00	8,700.00
Delivery Charges	Shipping and Handling			7.95	7.95
<i>Jamie's Summit</i>			<i>FF</i>		

Parts have a 30 day warranty, to file a warranty claim you will need to provide the installer info., (HVAC license number is required for gas and lp installations) a copy of original invoice and we will require return of the defective part and the original part that was replaced. Shipping costs are not covered under warranty.	Payment	\$-8,707.95
	Balance	\$0.00
	Total	\$8,707.95



Surrebuttal Schedule DM-3
Commonwealth of Massachusetts
OFFICE OF CONSUMER AFFAIRS
DIVISION OF PROFESSIONAL LICENSURE
Board of State Examiners of Plumbers and Gasfitters
 1000 Washington Street, Suite 710 Boston, Massachusetts 02118-6100

FOR BOARD USE ONLY SPG # _____ FEE _____

SPECIAL PERMISSION GAS DUAL FUEL REQUEST APPLICATION FORM

(1) TYPE OF REQUEST (CHECK APPROPRIATE BOX)

DUAL FUEL LOW PRESSURE <input type="checkbox"/>	DUAL FUEL ELEVATED PRESSURE <input type="checkbox"/>
---	--

(2) APPLICANT

NAME _____	TEL _____	FAX _____	EMAIL _____
ADDRESS _____		CITY _____	STATE _____ ZIP _____
A copy of this application, and all documentation was sent to the Plumbing/Gas Fitting Inspector on _____			
SIGNATURE _____		TITLE/POSITION _____	DATE _____

(3) INSTALLATION LOCATION INFORMATION

COMPANY NAME _____	TEL _____	FAX _____
ADDRESS _____		CITY/TOWN _____
EQUIPMENT BEING INSTALLED _____		
REASON FOR THIS REQUEST _____		

(4) SERVING GAS SUPPLIER INFORMATION (BOTH SIGNATURES ARE REQUIRED)

NATURAL GAS COMPANY NAME _____	_____
	AUTHORIZED SIGNATURE
PROPANE GAS COMPANY NAME _____	_____
	AUTHORIZED SIGNATURE

(5) FIRE DEPARTMENT (SIGNATURE IS NOT REQUIRED IF A LETTER FROM FIRE THE DEPARTMENT IS ATTACHED)

FIRE DEPARTMENT NOTIFIED OF THIS REQUEST ON _____	_____
	AUTHORIZED SIGNATURE

(6) FOR OFFICE BOARD USE ONLY

SPECIAL PERMISSION GAS REQUEST APPLICATION AND DOCUMENTATION RECEIVED ON _____, 20____
SPECIAL PERMISSION GRANTED ON _____, 20____ BY _____

ATTENTION: PLEASE DO NOT RETURN THESE NOTES WITH THE SPECIAL PERMISSION REQUEST

SPECIAL PERMISSION DUAL FUEL - GENERAL NOTES

1. \$86.00 APPLICATION FEE – MAKE CHECK PAYABLE TO THE COMMONWEALTH OF MASSACHUSETTS
2. MAIL THE COMPLETED APPLICATION, ALONG WITH THE APPROPRIATE FEE, TO THE BOARD OFFICE
3. INCOMPLETE APPLICATIONS WILL NOT BE ACTED UPON.
4. FOR ASSISTANCE, PLEASE CALL THE BOARD OFFICE AT 617-727-9952.

DUAL FUEL (NATURAL AND PROPANE GAS INSTALLATION REQUIREMENTS

UTILITY GAS AND UNDILUTED LIQUEFIED PETROLEUM GAS SHALL NOT THE INSTALLED WITHIN THE SAME BUILDING/STRUCTURE, EXCEPT WHERE THE BOARD HAS FIRST GRANTED SPECIAL PERMISSION UNDER 248 CMR 3.00.

1. WHERE THE TWO GAS SYSTEMS ARE INSTALLED WITHIN THE SAME BUILDING, THE NATURAL GAS PIPING SYSTEM SHALL BE COLOR CODED YELLOW AND THE PROPANE GAS PIPING SYSTEM COLOR CODED GREEN.
2. THE GAS PIPING SYSTEMS SHALL BE, LABELED AS FOLLOWS:
 - [A] AT A MINIMUM OF EVERY TEN (10) FEET
 - [B] AT ALL CHANGES OF DIRECTION
 - [C] ON EACH SIDE OF A PENETRATION THROUGH A PARTITION, WALL OR CEILING
 - [D] AT EVERY GAS SHUTOFF VALVE
 - [E] LABELS SHALL BE COLORED YELLOW WITH BLACK LETTERING
 - [F] THE LABELS SHALL INDICATE THE TYPE OF GAS AND THE PRESSURE WITHIN THE SYSTEM
 - [G] THE LETTERS SHALL BE SIZED SO THAT THE LABELING CAN BE READ FROM A NORMAL LINE OF VISION WHEN STANDING AT THE MAIN FLOOR LEVEL