

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

MISSOURI PROPANE GAS ASSOCIATION,)	
)	
Complainant,)	
)	
vs.)	File No. GC-2016-0083
)	
SUMMIT NATURAL GAS OF MISSOURI, INC.,)	
)	
Respondent.)	

AFFIDAVIT OF BRIAN T. BROOKS

STATE OF MISSOURI)
) ss
COUNTY OF Webster)

Brian T. Brooks, being first duly sworn on his oath, states:

1. My name is Brian T. Brooks. I am the Hearth Products Manager and Assistant Office Manager for Brooks Gas Company. My business address is 209 S. Clay, Marshfield, MO 65706. I am also a Board Member of the Missouri Propane Gas Association (MPGA).
2. I have reviewed the public versions of Summit Natural Gas of Missouri's (SNGMO) responses to MPGA's Data Requests relating to SNGMO's conversions of unvented heating products.
3. Based on the documents provided by SNGMO, between September 29, 2014, and September 4, 2015, SNGMO converted four unvented heating products from propane to natural gas. Based on the documents provided by SNGMO, I obtained the owners' manuals for each of those four unvented heating products that Summit converted from propane to natural gas.

4. On September 29, 2014, SNGMO converted an unvented heating product from propane to natural gas that was manufactured by DESA, model no. VMH26PRB/EFS26PRA. A copy of SNGMO's General Service Order and DESA's Owner's Manual pertaining to this product is attached as **Exhibit 1** hereto. Page 1 of the Owner's Manual indicates that it is for model nos. VMH26PRB and EFS26PRA.

a. On page 2 of the Owner's Manual, it states: "This appliance is only for use with the type of gas on the rating plate. This appliance is not convertible for use with other gases."

b. On page 4 of the Owner's Manual, it states: "1. This appliance is only for use with the type of gas on the rating plate. This appliance is not convertible for use with other gases."

c. On page 32 of the Owner's Manual, under the "Specifications" section for model no. VMH26PRB/EFS26PRB it states:

"Type of Gas Propane /LP gas only."

5. On January 23, 2015, SNGMO converted an unvented heating product from propane to natural gas that was manufactured by DESA, model no. VGF28PT. A copy SNGMO's General Service Order and DESA's Owner's Manual pertaining to this product is attached as **Exhibit 2** hereto. I found the correct owner's manual for this product on the internet at <http://desatech.com> under the heading on the right side of the page, "Manuals With Parts List" and Subheading ""Indoor Heating" by clicking on "Fireplace" and when the dropbox appeared, clicking on model no. VGF28PT, and the manual automatically downloads. A copy of the above-described steps is attached as **Exhibit 3** hereto.

- a. On page 3 of the Owner's Manual, it states: "1. Use only propane gas. Do not convert fireplace to use different fuel type."
- b. On page 32 of the Owner's Manual, under the "Specifications" section, it states:
"Type of Gas Propane Gas Only."

6. On March 19, 2015, I was in attendance at a meeting in SNGMO's office in Sunrise Beach, MO, where I witnessed SNGMO convert an unvented heating product from propane to natural gas that was manufactured by SHM International Corp. The rating plate applies to multiple models: (S, B) VFMV (21,24,27,30) LP. A copy of the rating plate attached to the product that was supplied by SNGMO in response to a MPGA data request and a copy of the SHM Owner's Manual pertaining to the product is attached as **Exhibit 4** hereto. Page 1 of the manual indicates that it is for model no. (S, B) VFMV 24 LP.

- a. The rating plate attached by the manufacturer to the product says the following:
 - i. "Gas Type Propane/LP"
 - ii. "This appliance is only for use with propane gas. This appliance shall not be field converted."
 - iii. "This appliance is only for use with the type of gas indicated on the rating plate."
 - iv. "This appliance is not convertible for use with other gases."
- b. The Owner's Manual is consistent with the language on the rating plate and contains the following language:
 - i. Page 1: "This appliance is only for use with the type of gas on the rating plate. This appliance is not convertible for use with other gases."

ii. Page 3: "1. This appliance is only for use with the type of gas on the rating plate. This appliance is not convertible for use with other gases."


iii. Page 25: Under the "Specifications" section for model VFM 21,24 LP and VFM 27,30 LP, it states: "Gas Type Propane/LP"

7. On September 4, 2015, SNGMO converted an unvented gas heating product from propane to natural gas that was manufactured by Sure Heat, model no. BIVFMV. A copy of SNGMO's General Service Order and Sure Heat's Owner's Manual is attached as **Exhibit 5** hereto. I found the correct manual on the internet at <http://sureheat.com/manuals/heaters/bivfmv.pdf>.

a. On page 1 of the Owner's manual, it states: "NOTE: THIS UNIT CANNOT BE CONVERTED TO DIFFERENT GAS TYPE."

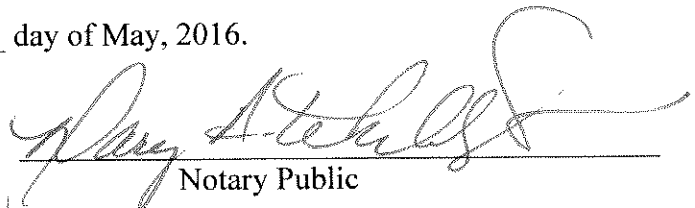
b. On page 1 of the Owner's Manual, it states: "THIS APPLIANCE IS ONLY FOR USE WITH THE TYPE OF GAS INDICATED ON THE RATING PLATE. THIS APPLIANCE IS NOT CONVERTIBLE FOR USE WITH OTHER GASES."

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



Brian T. Brooks

Subscribed and sworn to before me this 11 day of May, 2016.



Notary Public

My commission expires: 9/23/2018

