

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of Southern Missouri Gas	)	
Company LP's, d/b/a Southern Missouri	)	
Natural Gas' Winter Purchased Gas	)	<b><u>File No. GR-2012-0123</u></b>
Adjustment Filing.	)	

**STAFF RESPONSE TO  
COMMISSION ORDER DIRECTING FILING**

**COMES NOW** the Staff of the Missouri Public Service Commission ("Staff") and in Response to the Commission's October 21 Order Directing Staff to file Recommendation states:

1. On October 21, 2011, Southern Missouri Gas Company d/b/a Southern Missouri Natural Gas Company, L.P. (SMNG or Company) of Mountain Grove, Missouri, filed a tariff sheet with a proposed effective date of November 4, 2011.

2. The tariff sheet changes SMNG's Purchased Gas Adjustment (PGA) factor and also changes its Actual Cost Adjustment (ACA) factor for the upcoming heating season (November 2011 – March 2012).

3. Staff has determined that the rates in the proposed tariff sheet were calculated in conformance with SMNG's PGA Clause.

4. Staff is of the opinion that good cause for approval of these tariff sheets on less than thirty (30) days notice is demonstrated by SMNG's Commission-approved PGA clause allowing for ten (10) business days notice for PGA change filings.

**WHEREFORE** Staff recommends the tariff sheet filed on October 21, 2011 be approved on an expedited but interim basis, subject to refund.

Respectfully submitted,

**/s/ Lera L. Shemwell**

Lera L. Shemwell  
Deputy General Counsel  
Missouri Bar No. 43792

Attorney for the Staff of the  
Missouri Public Service Commission  
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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered or transmitted by facsimile or electronic mail to all counsel of record this 28th day of October, 2011.

**/s/ Lera L. Shemwell**

## MEMORANDUM

TO: Missouri Public Service Commission Official Case File,  
File No. GR-2012-0123, Tariff File No. YG-2012-0173,  
Southern Missouri Gas Company d/b/a Southern Missouri Natural Gas Company,  
L.P.

FROM: Thomas M Imhoff, Energy Department - Tariffs/Rate Design

/s/ Thomas M. Imhoff 10/28/11  
Energy Unit/Date

/s/ Lera Shemwell 10/28/11  
Chief Staff Counsel's/Date

SUBJECT: Staff Recommendation on Southern Missouri Gas Company d/b/a Southern  
Missouri Natural Gas Company, L.P.'s Winter Season PGA Filing Effective  
November 4, 2011

DATE: October 28, 2011

On October 21, 2011, Southern Missouri Gas Company d/b/a Southern Missouri Natural Gas Company, L.P. (SMNG or Company) of Mountain Grove, Missouri, filed a tariff sheet with a proposed effective date of November 4, 2011. The tariff sheet was filed to reflect changes in SMNG's Purchased Gas Adjustment (PGA) factor and changes in the Actual Cost Adjustment (ACA) factor for the upcoming heating season (November 2011 – March 2012).

The net effect of this change will decrease the Total PGA factor to \$0.6198 per hundred cubic feet (Ccf) from the Total PGA factor of \$0.6530 per Ccf currently in effect. This represents a decrease of \$0.0332 per Ccf.

Case No. GR-2012-0123, under which this change was filed, was established to track the Company's PGA factors to be reviewed in its 2010-2011 ACA filing. Case No. GR-2010-0218 was established to track the Company's PGA factors to be reviewed in its 2009-2010 ACA filing. Interim subject to refund status should be maintained pending a final Commission decisions in Case Nos. GR-2012-0123 and GR-2010-0218.

Due to the limited time available to review the documentation supporting the ACA factor submitted in this filing, the Procurement Analysis Unit (PAU) has requested permission to submit its results and recommendations regarding the information included in this ACA filing to the Commission on or before June 1, 2012.

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OFFICIAL CASE FILE MEMORANDUM  
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The Energy Unit – Tariffs/Rate Design Staff (Staff) has verified that the Company has filed its annual report and is not delinquent on any assessment. Staff has reviewed this filing and is not aware of any issue currently pending before the Commission that affects or is affected by this filing.

Staff has determined that the rates on the proposed tariff sheet were calculated in conformance with SMNG's PGA Clause. Staff is of the opinion that good cause for approval of these tariff sheets on less than thirty (30) days notice is demonstrated by SMNG's Commission-approved PGA clause allowing for ten (10) business days notice for PGA change filings. Therefore, Staff recommends that the following tariff sheet be approved on an interim basis, subject to refund:

P.S.C. MO No. 1

29<sup>th</sup> Revised Sheet No. 27, Cancelling 28<sup>th</sup> Revised Sheet No. 27.

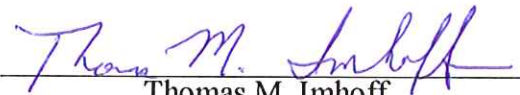
**BEFORE THE PUBLIC SERVICE COMMISSION**  
**OF THE STATE OF MISSOURI**

In the Matter of Southern Missouri Gas	)	
Company, L.P., d/b/a Southern Missouri	)	File No. GR-2012-0123
Natural Gas's Winter Purchased Gas	)	Tariff File No. YG-2012-0173
Adjustment Filing	)	

**AFFIDAVIT OF THOMAS M. IMHOFF**

STATE OF MISSOURI     )  
                                      ) ss  
COUNTY OF COLE     )

Thomas M. Imhoff, of lawful age, on oath states: that he participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was provided to him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief.

  
\_\_\_\_\_  
Thomas M. Imhoff

Subscribed and sworn to before me this 28<sup>th</sup> day of October, 2011.



  
\_\_\_\_\_  
Notary Public