

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

In the Matter of Summit Natural Gas of)
Missouri, Inc., Changes to Company’s)
Purchase Gas Adjustment “PGA”)
Clause)

Case No. GR-2022-0191
Tracking No. JG-2022-0209

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission and for its Recommendation, states as follows:

1. On January 18, 2022, Summit Natural Gas of Missouri, Inc. (“SNGMO”) filed three tariff sheets bearing effective dates of February 1, 2022, Tariff File No. JG-2022-0209, and an accompanying cover letter with supporting worksheets. The tariff sheets were filed to reflect changes in SNGMO’s Regular Purchased Gas Adjustment (“RPGA”) factors as a result of estimated changes in the cost of natural gas. The tariff sheets do not change the Actual Cost Adjustment (“ACA”) factors.

2. The Commission issued an order on January 19, 2022, directing Staff to file a recommendation regarding SNGMO’s request and corresponding tariff sheets, Tariff File No. JG-2022-0209, no later than January 24, 2022.

3. Staff has reviewed SNGMO’s filing and determined it was calculated in conformance with SNGMO’s PGA Clause and notes that optional PGA changes are authorized in SNGMO’s tariff.¹ Staff does not oppose the approval of these tariffs sheets on less than thirty (30) days’ notice. Such action is supported by SNGMO’s Commission-approved PGA Clause allowing for ten (10) business days’ notice for PGA change filings.

¹ See SNGMO’s Tariff Sheet No. 51 part A.

4. Staff recommends the Commission approve the tariff sheets in Tariff File No. JG-2022-0209, on an interim basis, subject to refund, for service on and after February 1, 2022.

WHEREFORE, for the foregoing reasons and those stated in Staff's Memorandum attached hereto, Staff recommends that the Commission issue an order approving SNGMO's tariff sheets filed in Tariff File No. JG-2022-0209, on an interim basis, subject to refund status.

Respectfully submitted,

/s/ Jamie S. Myers
Jamie S. Myers
Deputy Staff Counsel
Missouri Bar Number 68291
P.O. Box 360
Jefferson City, MO 65102
573-526-6036 (Voice)
573-526-6969 (Fax)
jamie.myers@psc.mo.gov

Attorney for Staff of the
Missouri Public Service Commission

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 on this 24th day of January, 2022.

/s/ Jamie S. Myers

MEMORANDUM

TO: Missouri Public Service Commission Official Case File,
File No. GR-2022-0191, Tariff No. JG-2022-0209
Summit Natural Gas of Missouri, Inc.

FROM: Michael J. Ensrud, Research/Data Analyst - Procurement Analysis Dept.

/s/ David M. Sommerer 1/24/2022 /s/ Jamie Myers 1/24/2022
Financial and Business Analysis Div./Date Staff Counsel's Office/Date

SUBJECT: Staff Recommendation for Summit Natural Gas of Missouri, Inc. Optional
PGA Filing Effective Date February 1, 2022

DATE: January 24, 2022

On January 18, 2022, Summit Natural Gas of Missouri, Inc. (“SNGMO” or “Company”), filed three tariff sheets bearing a proposed effective date of February 1, 2022. In addition SNGMO filed a single cover letter and supporting worksheets. The tariff sheets were filed to reflect changes in SNGMO’s Regular Purchased Gas Adjustment (RPGA) factors as the result of estimated changes in the cost of natural gas. The Actual Cost Adjustment (ACA) factors did not change as a result of this filing.

On January 19, 2022, the Commission issued its “**Order Directing Expedited Staff Recommendation and Setting Time for Responses**”. The order directs Staff to file its recommendation no later than January 24, 2022.

The filing revises the following **existing** tariff pages:

- P.S.C. MO No. 3, 7th Revised Sheet No. 56
- P.S.C. MO No. 3, 7th Revised Sheet No. 57
- P.S.C. MO No. 3, 7th Revised Sheet No. 58

This filing proposes reductions in RPGA rates for all customer classes by division as noted below:

Division	Current RPGA	ACA	Current Total PGA
Gallatin	\$ 0.5984	\$ 0.0563	\$ 0.6547
Warsaw/Lake of the Ozarks	\$ 0.7046	\$ 0.3047	\$ 1.0093
Rogersville/Branson	\$ 0.6888	\$ 0.3320	\$ 1.0208

Division	Proposed		Proposed
	RPGA	ACA	Total PGA
Gallatin	\$ 0.5375	\$ 0.0563	\$ 0.5938
Warsaw/Lake of the Ozarks	\$ 0.6074	\$ 0.3047	\$ 0.9121
Rogersville/Branson	\$ 0.5901	\$ 0.3320	\$ 0.9221

Division	RPGA	RPGA	Increase/
	Current	Proposed	(Decrease)
Gallatin	\$ 0.5984	\$ 0.5375	\$ (0.0609)
Warsaw/Lake of the Ozarks	\$ 0.7046	\$ 0.6074	\$ (0.0972)
Rogersville/Branson	\$ 0.6888	\$ 0.5901	\$ (0.0987)

SNGMO’s cover letter makes following representations:

These revised sheets include changes to Company’s Purchased Gas Adjustment (PGA) Clause as approved by the Commission. These revisions reflect adjustments to the Regular Purchased Gas Adjustment (RPGA)¹ factors only.

The changes in the PGA factors applicable to the Company’s Gallatin Division will decrease the firm sales customers’ Total PGA from \$0.6547 / Ccf to \$0.5938 / Ccf. The proposed decrease will cause an average winter month residential gas bill to decrease by approximately \$7.76. This represents a 4.37% decrease for the average month in the heating season.

The changes in the PGA factors applicable to the Company’s Warsaw and Lake of the Ozarks Divisions will decrease the sales customers’ Total PGA from \$1.0093/Ccf to \$0.9121/Ccf. The proposed decrease will cause an average winter month residential gas bill to decrease by approximately \$5.93. This represents a 4.23% decrease for the average month in the heating season.

The changes in the PGA factors applicable to the Company’s Rogersville and Branson Divisions will decrease the firm sales customers’ Total PGA from \$ \$1.0208/Ccf to \$ \$0.9221/Ccf. The proposed increase (should be “decrease”) will cause an average winter month residential gas bill to decrease by approximately \$9.53. This represents a 5.08% decrease for the average month in the heating season.

Case No. GR-2022-0191, under which these changes were filed, was established to track SNGMO’s PGA factors to be reviewed in its 2021-2022 ACA filing. Case No. GR-2022-0122 was established to track the Company’s PGA factors to be reviewed in its (2020-2021) ACA filing.

¹ (RPGA +ACA = Total PGA) SNGMO emphasizes it is only the RPGA that is changing. The total PGA rates (not the Regular PGA figure) are used in the cover letter calculations.

Case No. GR-2021-0124, was established to track SNGMO's PGA factors to be reviewed in its 2019-2020 ACA filing. These rate changes should be made on an interim basis, subject to refund pending final Commission decisions in ACA Case No. GR-2021-0124 (2019-2020 ACA filing, Case No. GR-2022-0122 (2020-2021 ACA filing) and ACA Case No. GR-2022-0191 (2021-2022 ACA filing).

The 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, other than those mentioned above.

Staff has reviewed this filing and determined that the rates on the proposed tariff sheets were calculated in conformance with SNGMO's PGA Clause. Optional PGA changes are authorized under Tariff Sheet No. 51 part A. Staff asks the Commission to take notice of SNGMO's tariff language that allows for approval of these tariff sheets on less than thirty (30) days' notice is demonstrated by SNGMO's Commission-approved PGA clause allowing for ten (10) business days' notice for PGA change filings. Therefore, Staff recommends that the following tariff sheets filed on January 18, 2022 and effective on February 1, 2022 be approved on an interim basis, subject to refund:

P.S.C. MO No. 3

8th Revised Sheet No. 56, Cancelling 7th Revised Sheet No. 56

8th Revised Sheet No. 57, Cancelling 7th Revised Sheet No. 57

8th Revised Sheet No. 58, Cancelling 7th Revised Sheet No. 58

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OF THE STATE OF MISSOURI

In the Matter of Summit Natural Gas of)
Missouri, Inc., Changes to Company's) File No. GR-2022-0191
Purchase Gas Adjustment "PGA" Clause)

AFFIDAVIT OF MICHAEL J. ENSRUD

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW MICHAEL J. ENSRUD and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation* in Memorandum form; and that the same is true and correct according to his best knowledge and belief.

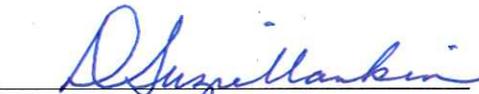
Further the Affiant sayeth not.


MICHAEL J. ENSRUD

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 24th day of January 2022.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2025
Commission Number: 12412070


Notary Public