

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

Ozarks Medical Center d/b/a Ozarks Healthcare,)	
Complainant)	
v.)	Case No. GC-2022-0158
)	
Summit Natural Gas of Missouri, Inc.,)	
Respondent)	

Position Statement

COMES NOW the Office of the Public Counsel (“OPC” or “Public Counsel”) and presents its positions on the contested issues as follows:

Issue 1: Should the Public Service Commission address OMC’s cashout imbalance by authorizing/directing SNGMO to track and defer the imbalance as a regulatory asset for recovery in SNGMO’s next general rate proceeding?

Public Counsel opposes Ozark Medical Center’s (“OMC”) request for an accounting authority order (“AAO”) because OMC seeks the AAO to require other ratepayers to subsidize the gas OMC used during Winter Storm Uri.

Issue 2: Should the Public Service Commission order SNGMO to address OMC’s cashout imbalance through a separate payment arrangement? If so, what should the length and payment terms be for any ordered payment arrangement?

Public Counsel supports a payment plan that helps OMC’s ability to make payments and continue serving the community. Public Counsel would likely support any payment plan length agreed to by OMC, including a 5-year

payment period, which would be consistent with the approved payment period for Winter Storm Uri gas costs in Case No. GR-2022-0122.¹

WHEREFORE, the Office of the Public Counsel respectfully offers this Position Statement.

Respectfully submitted,

/s/ Marc Poston

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to all counsel of record this 18th day of May, 2022.

/s/ Marc Poston

¹ Order Rejecting Tariff, Approving Extended Recovery Period, Delegating Authority, and Directing Filing of Procedural Schedule, November 17, 2021, Case No. GR-2022-0122, *In the Matter of Summit Natural Gas of Missouri, Inc.'s Changes to the Company's Purchase Gas Adjustment "PGA" Clause*