

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

In the Matter of the Application of Summit Natural Gas of Missouri, Inc. for a Variance from the Provisions of Commission Rule 20 CSR 4240-10.030(19))))) Case No. GE-2018-0193

SECOND MOTION FOR VARIANCE

COMES NOW Summit Natural Gas of Missouri, Inc. (“SNGMO” or “the Company”), and, as its *Second Motion for a Variance* from the *Order Approving Stipulation and Agreement* relating to the Company’s Meter Sampling Test Program due to operational and testing restrictions that continue to result from the COVID-19 pandemic. In support thereof, SNGMO respectfully states as follows to the Missouri Public Service Commission (“Commission”):

1. On September 5, 2018, the Commission issued its *Order Approving Stipulation and Agreement*, in this case, granting SNGMO’s variance from Commission Rule 20 CSR 4240-10.030(19).¹ Through its Order, the Commission approved the Company’s Meter Sampling Test Program (“Program”), included as Appendix A to the *Non-Unanimous Stipulation and Agreement* filed on August 17, 2018.

2. On January 1, 2019, SNGMO began testing meters in accordance with its Program. On March 4, 2020, SNGMO provided Staff and the Office of the Public Counsel a report on the previous calendar year test results, as required by Section 9 of the Program.

3. On September 10, 2020, SNGMO filed a *Motion for Variance* from its Program. SNGMO explained in its *Motion for Variance* that COVID-19 had created operational limitations that prevented it from completing that task. As such, SNGMO asked that it be relived from the obligation to test 211 meters in 2020 and permitted SNGMO to begin its 2021 testing requirement

¹ At that time, the subject Commission Rule was known as 4 CSR 240-10.030(19).

to test 218 American AC-250 meters on January 1, 2021. The Commission issued its *Order Approving Variance* on October 21, 2020, and due to the COVID-19 pandemic, found good cause to grant SNMGO's requested variance from its Program

4. On March 10, 2021, SNGMO again provided Staff and the Office of the Public Counsel with a report on the previous calendar year test results, as required by Section 9 of the Program.

5. Unfortunately, the impacts from COVID-19 have continued to create operational limitations that have extended into 2021 and have continued to prevent SNGMO from completing its tasks. Specifically, in accordance with state and federal COVID-19 related health guidance, SNGMO has continued to implement restrictions on field activity and customer interactions, to include suspension of meter removals requiring facility entry or customer interaction. As a result, SNGMO will be unable to meet its required 2021 meter test thresholds as required by the Company's Program, as well as its four year commitment in this regard.

6. SNGMO has continued to remove and replace a reduced quantity of meters when safe and practical and to utilize third party testing vendors to test meters the Company has removed from the field. However, due to COVID-19 related staffing and testing facility restrictions, the Company's third-party vendor testing capacity has continued to be reduced.

7. Based on current 2021 meter removal and testing quantities, SNGMO's projected 2021 meter tests will not meet the required testing quantities under its testing program for certain meter lots² or groups.³ SNGMO will continue to remove and test meters while exercising appropriate public health protections. At the conclusion of the test period, December 31, 2021,

² As described in Appendix A to the Non-Unanimous Stipulation an Agreement, a Lot is defined as "Meters of the Group with the same set year."

³ As described in Appendix A to the Non-Unanimous Stipulation an Agreement, a Group is defined as "Meters of a similar manufacturer and model."

SNGMO will review the annual testing results to determine the statistical relevance of the meter test quantities in each lot. If a lot has a required volume of tests as to be statistically relevant, SNGMO will analyze the tests results as required under the testing program to assess for required meter remediation programs. As required by the Company's meter testing waiver, SNGMO will submit an annual report of its meter test results to the Commission, including a description of any analyses that resulted in the adoption of a meter remediation program.

8. Paragraph 4(C) of SNGMO's Meter Sampling Test Program requires 218 American AC-250 meters to be tested in 2021. Given the technical complexities associated with administering a meter testing program, SNGMO would be unable to manage its 2021 American AC-250 meter test requirement beyond the conclusion of the calendar year, while concurrently beginning its 2022 American AC-250 meter testing requirement of 164 meters.

9. Accordingly, SNGMO moves the Commission for a second variance from its Program as follows: SNGMO requests that it be relived from the obligation to test a total of 218 American AC-250 meters in calendar year 2021, and permitted to begin the 2022 testing requirement on January 1, 2022.

10. SNGMO agrees to file within its 2021 annual report the number of American AC-250 meters that were tested in calendar year 2021 and the meter testing results of those meters.

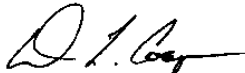
11. SNGMO will continue to monitor the spread and impact of the pandemic to align its field operations, customer interactions, and meter testing with local, state, and federal COVID-19 guidance. SNGMO has removed and tested meters throughout the first half of 2021 and will continue to remove and test meters as it is safe to do so. Changing health guidance may have further impacts on the Company's meter testing program resulting in positive or negative impacts to meter removal and testing capabilities.

12. Lastly, Paragraph 4.D. of Appendix A to the Non-Unanimous Stipulation and Agreement contains a requirement that full compliance with Missouri Public Service Commission Rule 20 CSR 4240-10.030(19)⁴ by December 31, 2022. As indicated above, SNGMO will effectively lose two years of its meter test program due to the pandemic. SNGMO does not ask for any relief in regard to the December 31, 2022 target date at this time. However, SNGMO will need to address this matter in the future.

WHEREFORE, SNGMO respectfully moves the Commission to grant it the variance described herein and such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

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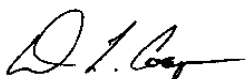
**ATTORNEYS FOR SUMMIT NATURAL GAS
OF MISSOURI, INC.**

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail to the following counsel this 5th day of August, 2021:

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⁴ Then, it was known as 4 CSR 240-10.030(19).