

**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 4 CSR 240-10.030(19))

Case No. GE-2018-0193

STAFF RECOMMENDATION

COME NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Staff Recommendation* regarding the September 10, 2020 *Motion for Variance* (Motion) filed by Summit Natural Gas of Missouri, Inc. (SNGMO), states as follows:

1. SNGMO filed its Motion seeking a variance from the Commission’s Order Approving Stipulation and Agreement (Order) issued September 5, 2018. The Motion requests the Commission grant SNGMO a variance from the Order as its relates to SNGMO’s Meter Sampling Test Program (Program) due to field operational and testing restrictions that have occurred as a result of the COVID-19 pandemic. The 2018 Order had granted SNGMO a variance from Commission Rule 20 CSR-4240-10.030(19) which requires gas meters to be removed, inspected, and tested every 120 days.

2. Due to the COVID-19 crisis, SNGMO requests to be relieved from the 2020 Program requirement of testing 211 American AC-250 meters in 2020 and permitted to begin its 2021 Program requirement of testing 218 American AC-250 meters on January 1, 2021. At this time, SNGMO is not requesting relief from the testing requirement of 164 American AC-250 meters in 2022.

3. As stated in Staff’s Memorandum, attached hereto, SNGMO agrees to file the number of American AC-250 meters it tested in calendar year 2020, and the results

of those meter tests, in its 2020 annual report and has stated its commitment to continue to remove and test meters when it is safe to do so.

3. Based on Staff's review of SNGMO's Motion for variance, and all applicable filings, Staff recommends the Commission grant approval of the requested variance to Commission Rule 20 CSR-4240-10.030(19) as it relates to SNGMO's Program obligation to test a total of 211 American AC-250 meters in calendar year 2020. Staff also recommends SNGMO be permitted to begin its 2021 testing requirement on January 1, 2021 as requested.

WHEREFORE, for the reasons stated above and in Staff's Memorandum, Staff recommends the Commission grant SNGMO's Motion for variance from the Commission's 2018 Order as its relates to SNGMO's Meter Sampling Test Program due to field operational and testing restrictions that have occurred as a result of the COVID-19 pandemic.

Respectfully submitted,

/s/ Robert S. Berlin

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 1st day of October, 2020, to all counsel of record.

/s/ Robert S. Berlin

MEMORANDUM

TO: Missouri Public Service Commission Official Case File,
Case No. GE-2018-0193, Tariff Tracking No. BORD-2020-0555
Summit Natural Gas of Missouri, Inc.

FROM: Kim Cox, Tariff/Rate Design Department, Industry Analysis Division

/s/ Robin Kliethermes / 10-01-20

Robin Kliethermes / Date
Tariff/Rate Design Manager

/s/ Robert S. Berlin / 10-01-20

Robert S. Berlin / Date
Staff Counsel's Office

SUBJECT: Staff Recommendation Regarding Summit Natural Gas of Missouri request
for variance

DATE: October 1, 2020

On September 10, 2020, Summit Natural Gas of Missouri, Inc. ("SNGMO") filed, with the Missouri Public Service Commission ("Commission"), a Motion for a Variance from the Commission's Order Approving Stipulation and Agreement issued on September 5, 2018, in this docket. The motion requests the Commission grant a variance from its Order as it relates to the SNGMO's Meter Sampling Test Program due to operational and testing restriction resulting from the COVID-19 pandemic.

On September 5, 2018, the Commission issued an Order Approving Stipulation and Agreement that granted SNGMO a variance from Commission Rule 20 CSR-4240-10.030(19)¹. The Commission Order approved SNGMO's Meter Sampling Test Program which outlined general meter testing, sampling, and reporting. Due to the COVID-19 crisis, SNGMO requests to be relieved from the 2020 program requirement of testing 211 American AC-250 meters in 2020 and permitted to begin its 2021 program requirement of testing 218 American AC-250 meters on January 1, 2021. At this time SNGMO is not requesting relief from the testing requirement of 164 American AC-250 meters in 2022.

SNGMO agrees to file the number of American AC-250 meters tested in calendar year 2020, and the results of those meters, in its 2020 annual report and has stated that it will continue to remove and test meters when it is safe to do so.

The Staff has reviewed the motion for variance and all applicable filings and recommends approval of the variance to Commission Rule 20 CSR-4240-10.030(19) as it relates to the obligation to test a total of 211 American AC-250 meters in calendar year 2020, and further recommends SNGMO be permitted to begin the 2021 testing requirement on January 1, 2021.

Staff has verified that Ameren Missouri has filed its annual report, and is not delinquent on its PSC assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

¹ At the time of filing the Commission Rule was known as 4 CSR 240-10.030(19).

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AFFIDAVIT OF KIM COX

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COME NOW KIM COX and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation* in memorandum form; and that the same is true and correct according to her best knowledge and belief, under penalty of perjury.

Further the Affiants sayeth not.

/s/ *KIM COX*
_____ **KIM COX**