

**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

MOTION FOR VARIANCE

COMES NOW Summit Natural Gas of Missouri, Inc. (“SNGMO” or “the Company”), and, as its *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 resulting 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 (“testing program” or “meter test waiver”), included as Appendix A to the Non-Uniform Stipulation and Agreement filed on August 17, 2018.

2. On January 1, 2019, SNGMO began testing meters in accordance with its Meter Sampling Test 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 Meter Sampling Test Program.

3. Since then, COVID-19 has created meter testing and operational limitations that will render SNGMO unable to meet its required 2020 meter test thresholds as required by the

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

Company's Meter Sampling Test Program, as well as its four year commitment in this regard. Specifically, in accordance with state and federal COVID-19 related health guidance, SNGMO has implemented new restrictions on field activity and customer interactions. To maintain the safety of Company employees and customers, SNGMO has suspended meter removals requiring facility entry or customer interaction during the COVID-19 health crisis. Due to this suspension in meter removals, the Company's ability to administer its meter test program as required has been constrained.

4. SNGMO has continued to remove and replace a reduced quantity of meters when safe and practical. SNGMO utilizes third party testing vendors to test meters the Company has removed from the field. Due to COVID-19 related staffing and testing facility restrictions, the Company's third-party vendor testing capacity has also been reduced.

5. Based on current 2020 meter removal and testing quantities, SNGMO's projected 2020 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, 2020, 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.

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."

6. Paragraph 4(C) of SNGMO's Meter Sampling Test Program requires 211 American AC-250 meters to be tested in 2020. Given the technical complexities associated with administering a meter testing program, SNGMO would be unable to manage its 2020 American AC-250 meter test requirement beyond the conclusion of the calendar year, while concurrently beginning its 2021 American AC-250 meter testing requirement of 218 meters..

7. Accordingly, SNGMO moves the Commission for a variance from its Meter Sampling Test Program as follows: SNGMO requests that it be relived from the obligation to test a total of 211 American AC-250 meters in calendar year 2020, and permitted to begin the 2021 testing requirement on January 1, 2021.

8. SNGMO agrees to file within its 2020 annual report the number of American AC-250 meters that were tested in calendar year 2020 and the meter testing results of those meters.

9. 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 quarter of 2020 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.

10. 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 a year 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, depending on

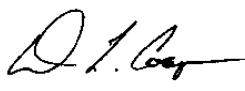
⁴ Then 4 CSR 240-10.030(19).

conditions over the next two years, SNGMO may 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,

BRYDON, SWEARENGEN & ENGLAND P.C.

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ATTORNEYS FOR SUMMIT NATURAL GAS
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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 10th day of September, 2020:

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