

**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) **Case No. GE-2018-0193**
Commission Rule 20 CSR 4240-10.030(19))

STAFF RECOMMENDATION

COME NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Recommendation* in this matter hereby states:

1. The Commission previously approved *Stipulation and Agreement* including a variance for Summit Natural Gas of Missouri, Inc. (SNGMO) of a provision contained in 20 CSR 4240-10.030(19) regarding gas meter inspection and testing procedures to ensure compliance with the requirements of section 18 of the same rule on September 5, 2018. SNGMO then applied for a variance from the Meter Testing Program established in that *Stipulation* in relation to the COVID-19 pandemic on September 10, 2020, which the Commission granted. SNGMO now files a *Second Motion for Variance*.

2. SNGMO states that the impacts from COVID-19 continue to create operational limitations that extend into 2021 and continue to prevent SNGMO from completing its required testing in accordance with the Program. The Company reports that it has implemented restrictions on field activity and customer interactions in accordance with state and federal health guidance. SNGMO has tested some meters in 2021, but states that its projections do not show that it will meet the required testing quantities for certain meter lots or groups. The Company

commits to submitting its report for 2021 meter testing to Staff and the Office of the Public Counsel in accordance with the stipulated Program. It asks that the Commission permit it to begin to fulfill the 2022 testing requirements on January 1, 2022. SNGMO also notes that the provision contained in the *Stipulation* regarding SNGMO's full compliance with 20 CSR 4240-10.030(19) by December 31, 2022, will need to be addressed in the future.

3. Staff has reviewed the Company's request for variance from the testing requirements provision in the *Stipulation and Agreement* and in lieu of a Staff Report, states its approval of the request within this pleading.

WHEREFORE, Staff prays that the Commission will accept this *Recommendation*; grant Summit Natural Gas of Missouri, Inc.'s request for variance from the provision regarding meter testing contained in the *Stipulation and Agreement* approved in this matter on September 5, 2018; and grant such other and further relief as the Commission considers just in the circumstances.

/s/ Whitney Payne

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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 8th day of September, 2021, to all counsel of record.

/s/ Whitney Payne