

**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) **File No. GE-2018-0193**
from the Provisions of Commission Rule)
20 CSR 4240-10.030(19))

RESPONSE TO COMMISSION ORDER DIRECTING FILING

COME NOW Summit Natural Gas of Missouri, Inc. (“SNGMO” or “the Company”) and the Staff of the Missouri Public Service Commission (“Staff”) (collectively, the “Parties”) by and through undersigned counsel and hereby submit their *Response to Commission Order Directing Filing* issued on February 8, 2023 and in support thereof state as follows:

1. The Company and Staff agree to a waiver as recommended by Staff that would extend the completion deadline for both the Meter Test Program and the Catch-Up Program to December 31, 2025. Both Parties recognize that adjustments may need to be requested in the future.

2. The Company and Staff agree that the Commission should include in its order a requirement that SNGMO file a report with the Commission detailing its progress towards compliance with the 2018 Stipulation on or before September 30 of 2023 and 2024. The September reports are intended to replace and expand upon the March annual reporting currently required by the 2018 Stipulation.

- a. The reports shall detail the following related to the four-year test program:
- Meter population, by lot, and corresponding sample size;
 - Summary of test results by lot;

- Summary of all remediation programs, by lot, and progress on remediation programs, by lot, completed over the test program;
 - Number of meters removed for testing;
 - Number of meters tested annually;
 - Description of impacts to annual meter testing target, including but not limited to supply-chain issues, internal constraints, and third-party testing; and
 - Plans to address impacts to annual meter testing target, including but not limited to, the re-evaluation of staffing and third-party contracts.
- b. The reports shall detail the following related to the four-year catch-up program:
- Number of remaining meters required to be tested to complete catch-up program;
 - Summary of test results by Group, as defined by the 2018 Stipulation, Appendix A;
 - Description of impacts to annual meter testing target, including but not limited to, supply-chain issues, internal constraints, and third-party testing; and
 - Plans to address impacts to annual meter testing target, including but not limited to, the re-evaluation of staffing and third-party contracts.

WHEREFORE, SNGMO and Staff respectfully request the Commission issue an Order granting the requested variance to December 31, 2024, as recommended by Staff.

Respectfully submitted,

/s/ Carolyn H. Kerr

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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 all counsel of record this 16th day of February, 2023.

/s/ Carolyn H. Kerr