

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

In the Matter of Summit Natural Gas of)
Missouri, Inc., for a Variance from the)
Provisions of Commission Rule)
4 CSR 240-10.030(19))

File No. GE-2018-0193

STAFF REPORT

COMES NOW the Staff of the Missouri Public Service Commission and for its Report states as follows:

1. On January 15, 2018, Summit Natural Gas of Missouri, Inc. (“SNGMO” or the “Company”) filed an *Application for Variance* (“Application”) with the Commission seeking a variance from Commission Rule 4 CSR 240-10.030(19). The Commission ordered Staff to file a Recommendation or alternative pleading no later than February 15, 2018.

2. Staff began an initial review of the *Application* and noted that it differs from previously approved applications for variance from this Commission Rule in several significant aspects, including sampling methodology and length of sampling period.

3. Based on questions raised in Staff’s initial review, Staff sent nineteen (19) data requests to SNGMO on January 22, 2018, seeking additional information on the results of historical meter testing, sampling methodology and the statistical basis for the requested variance. The responses to these data requests were due Sunday, February 11, 2018, four days before the Commission’s ordered filing date. Responses were received in EFIS on February 13, two days before the

ordered filing date. Staff still needs to analyze the responses received, and anticipates additional data requests may be necessary, as well as meeting with the Company.

4. Staff points out that if approved as requested, SNGMO's meter testing variance would differ from the meter testing variances granted to other Missouri gas utilities and potentially "open the door" for similar requests from other Missouri gas utilities. Therefore, Staff's investigation of this request requires particularly close examination.

WHEREFORE, for the reasons set forth above, Staff respectfully requests that the Commission issue an order for Staff to file its recommendation or an alternative pleading no later than April 15, 2018; and grant such other and further relief as it finds just in the circumstances.

Respectfully submitted,

/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 15th day of February, 2018, to all counsel of record.

/s/ Whitney Payne