

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

In the Matter of)
Summit Natural Gas of Missouri, Inc.'s) **File No. GR-2014-0096**
Purchased Gas Adjustment) **Tracking No. YG-2014-0179**

STAFF RESPONSE TO COMMISSION FILING

COMES NOW the Staff (“Staff”) of the Missouri Public Service Commission (“Commission”), by and through counsel, and in response to the Commission’s October 16 order hereby states:

1. On October 15, 2013, Summit Natural Gas of Missouri, Inc., (“SNG” or “Company”) filed tariff sheets with an effective date of November 1, 2013, to reflect changes in SNG’s purchased gas adjustment (PGA) factors. The changes are the result of estimated changes in the cost of natural gas for the upcoming winter season, and estimated changes in the actual cost adjustment (ACA) factor.

2. On October 16, 2013, the Commission ordered Staff to file its recommendation on an expedited basis, no later than October 23, 2013.

3. As explained in Staff’s *Memorandum*, attached hereto as Appendix A and incorporated by reference, the proposed tariff sheets apply to SNG’s Northern service area and its Southern service area.¹ Staff has determined that the rates in the proposed tariff sheets were calculated according to SNG’s PGA clause.

4. SNG’s Commission-approved PGA clause allows for ten business days’ notice for filings to change its PGA factor, and therefore good cause exists for approval of these tariff sheets on less than 30 days’ notice.

¹ SNG separately filed a similar tariff sheet for its territory previously known as Southern Missouri Natural Gas in Case No. GR-2014-0097.

WHEREFORE, Staff respectfully recommends the following tariff sheets filed on October 15, 2013, with an effective date of November 1, 2013, be approved on an interim basis, subject to refund:

P.S.C. MO. No. 1

Thirteenth Revised Sheet No. 51, Cancels Twelfth Revised Sheet No. 51

Seventh Revised Sheet No. 52, Cancels Sixth Revised Sheet No. 52

Respectfully Submitted,

/s/ John D. Borgmeyer

John D. Borgmeyer

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Missouri Bar No. 61992

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Missouri Public Service Commission

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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 23rd day of October, 2013.

/s/ John D. Borgmeyer

MEMORANDUM

TO: Missouri Public Service Commission Official Case File,
Case No. GR-2014-0096, File No. YG-2014-0179
Summit Natural Gas

FROM: Joel McNutt, Energy Unit – Tariffs/Rate Design

/s/ Thomas M. Imhoff 10/23/2013
Utility Operations Department/Date

/s/ John Borgmeyer 10/23/2013
Staff Counsel's Office/Date

SUBJECT: Staff Recommendation for the Summit Natural Gas Scheduled Winter Season
PGA Filing – Proposed Effective Date November 1, 2013

DATE: October 23, 2013

On October 15, 2013, Summit Natural Gas (SNG or Company) of Littleton, Colorado, filed tariff sheets bearing an effective date of November 1, 2013. The tariff sheets were filed to reflect changes in Summit's Purchased Gas Adjustment (PGA) factors as the result of estimated changes in the cost of natural gas for the upcoming winter season and changes in the Actual Cost Adjustment (ACA) factor. The winter season includes the months of November 2013 through March 2014.

For SNG's Northern Service Area (serving communities of Hamilton, Gallatin and Coffey plus the adjacent certificated service areas), this filing will increase the firm PGA factor for all firm customers for the upcoming heating season to \$0.4383 per hundred cubic feet (Ccf), from the current firm PGA factor of \$0.3955 per Ccf. This represents an increase of \$0.0428 per Ccf for all firm customers.

For SNG's Southern Service Area and Lake of the Ozarks Service Areas (serving communities such as Warsaw and Cole Camp), this filing will increase the firm PGA factor for all firm customers for the upcoming heating season to \$0.5528 per hundred cubic feet (Ccf), from the current firm PGA factor of \$0.4170 per Ccf. This represents an increase of \$0.1358 per Ccf for all firm customers.

Case No. GR-2014-0096, under which these changes were consolidated into and filed, was established to track the Company's PGA factors to be reviewed in its 2012-2013 ACA filing. Case No. GR-2013-0257 was established to track the Company's PGA factors to be reviewed in its 2011-2012 ACA filing. These rate changes should be made on an interim, subject to refund status pending final Commission decisions in ACA Case Nos. GR-2014-0096 and GR-2013-0257.

Due to the limited time available to review the documentation supporting the ACA factor represented in this filing, the Procurement Analysis Unit (PAU) requests permission to submit its

results and recommendations regarding the information included in this ACA filing to the Commission on or before December 19, 2014.

Staff has verified that this company has filed its annual report, and is not delinquent on any assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing, other than those mentioned above.

Staff has reviewed this filing and has concluded that it was calculated in conformance with SNG's PGA Clause. Staff is of the opinion that good cause for approval of these tariff sheets on less than thirty (30) days notice is demonstrated by SNG's Commission-approved PGA clause allowing for ten (10) business days notice for PGA change filings. Therefore, Staff recommends that the following tariff sheets as filed on October 15, 2013, be approved, interim subject to refund:

P.S.C. MO. No.1

Thirteenth Revised Sheet No.51, Cancels Twelfth Revised Sheet No. 51

Seventh Revised Sheet No. 52, Cancels Sixth Revised Sheet No.52

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

In the Matter of Summit Natural Gas of)
Missouri, Inc.'s Purchased Gas Adjustment)

Case No. GR-2014-0096

AFFIDAVIT OF JOEL McNUTT

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Joel McNutt, of lawful age, on oath states: that he participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was provided to him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief.



Joel McNutt

Subscribed and sworn to before me this 27th day of October, 2013.

LAURA BLOCH
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: June 21, 2015
Commission Number: 11203914



Notary Public