

**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 Waiver ) **Case No. GE-2023-0104**  
from Commission Rule 20 CSR 4240-14.020(1)(D) )  
and 14.030(3) Relating to Promotional Practices )

**STAFF RESPONSE TO SUMMIT NATURAL GAS OF MISSOURI, INC.  
REQUEST FOR WAIVER FROM  
COMMISSION RULE 20 CSR 4240-14.020(1)(D) AND 14.030(3)**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and for its *Staff Response to Summit Natural Gas of Missouri, Inc. Request for Variance from 20 CSR 4240-14.020(1)(D) and 14.030(3)* states the following:

1. On September 15, 2022, Summit Natural Gas of Missouri (“SNGMO” or “Company”) filed a request for a waiver from Commission Rule 20 CSR 4240-14.020(1)(D) and 14.030(3) relating to promotional practices. SNGMO also filed a motion for an expedited grant of this waiver so that a Commission order would be effective by October 10, 2022. SNGMO also requests waiver of the Commission’s 60-day notice requirement under 20 CSR 4240- 4.017.

2. On September 16, the Commission ordered Staff to file a recommendation or response by September 26, 2022, or a status report indicating the earliest date it will be able to file such recommendation or response.

3. Commission Rule 20 CSR 4240-14.010(2) allows for variances from the promotional practice rules contained within Chapter 14 “for good cause shown.” Commission Rule 20 CSR 4240- 2.205 also allows the Commission to grant a variance or waiver of any rule promulgated by the Commission upon a finding of good cause.

Staff<sup>1</sup> has reviewed SNGMO's requests and has no objection to approval of SNGMO's application for a limited waiver of Commission Rules 20 CSR 4240-14.020(1)(D) and 13.030(3) for the purpose of implementing SNGMO's proposed Trade Ally Rebate Program offering a fifty dollar (\$50) rebate to assist existing customers in replacing existing natural gas appliances with high-efficiency natural gas appliances.

**WHEREFORE**, Staff submits its *Staff Response to Summit Natural Gas of Missouri, Inc. Request for Variance from 20 CSR 4240-14.020(1)(D) and 14.030(3)* set forth above for the Commission's consideration.

Respectfully submitted,

**/s/ Don Cospers**

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Attorney for the Staff of the  
Missouri Public Service Commission

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been electronically mailed to all parties and/or counsel of record on this 26th day of September, 2022.

**/s/ Don Cospers**

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<sup>1</sup> Please see the attached affidavit of Brad Fortson.

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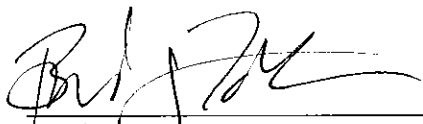
In the Matter of the Application of Summit )  
Natural Gas of Missouri, Inc. for a Waiver ) File No. GE-2023-0104  
from Commission Rule 20 CSR 4240- )  
14.020(1)(D) and 14.030(3) Relating to )  
Promotional Practices )

**AFFIDAVIT OF BRAD J. FORTSON**

COUNTY OF COLE ) ss.  
)

**COMES NOW** Brad J. Fortson, and on his oath declares that he is of sound mind and lawful age, that he contributed to the foregoing *Staff Response*; and that the same is true and correct according to his best knowledge and belief.

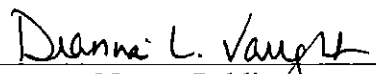
Further the Affiant sayeth not.

  
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Brad J. Fortson

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 23<sup>rd</sup> day of September, 2022.

DIANNA L. VAUGHT  
Notary Public - Notary Seal  
STATE OF MISSOURI  
Cole County  
My Commission Expires: July 18, 2023  
Commission #: 15207377

  
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Notary Public