

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

In the Matter of
Summit Natural Gas of Missouri's
Purchased Gas Adjustment

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Case No. GR-2013-0257
Tariff No. YG-2013-0223

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and for its Recommendation, states as follows:

1. On November 2, 2012, Summit Natural Gas of Missouri, Inc. (Summit or Company) (formerly known as Missouri Gas Utility) filed tariff sheets bearing an effective date of November 17, 2012.

2. The tariff sheets reflect changes in Summit's Purchased Gas Adjustment (PGA) factor and changes in the Actual Cost Adjustment (ACA) factor for its Northern and Southern and Lake of the Ozarks PGA service areas for the upcoming heating season of November 2012 – March 2013.

3. The same day the Commission issued its *Order Directing Filing Of Recommendation* (Order) regarding Summit's proposed tariff sheets no later than November 9, 2012.

4. Approval of this tariff will:

* decrease the PGA factor for the Northern service area by \$0.1034 per hundred cubic feet (Ccf) and,

* decrease the PGA factor for the Southern and Lake of the Ozarks service areas by \$0.1194 per Ccf for all firm customers.

5. Staff has reviewed Summit's proposed tariff sheets and submits its recommendation contained in Staff's Memorandum attached hereto as Appendix A.

6. Case No. GR-2013-0257, under which these changes were consolidated and filed, was established to track the Company's PGA factors to be reviewed in its 2011-2012 ACA filing. Case No. GR-2012-0115 was established to track the Company's PGA factors to be reviewed in its 2010-2011 ACA filing.

7. For reasons explained in its Memorandum, the Staff recommends the Commission approve Summit's proposed tariff sheets on an interim, subject to refund status pending final Commission decisions in Case Nos. GR-2013-0257 and GR-2012-0115.

WHEREFORE, the Staff recommends the Commission approve Tariff YG-2013-0223 as filed on November 2, 2012, on an interim subject to refund basis, allowing the tariff to become effective on November 17, 2012.

Respectfully submitted,

/s/ Robert S. Berlin

Robert S. Berlin
Senior Counsel
Missouri Bar No. 51709

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 9th day of November, 2012.

/s/ Robert S. Berlin

MEMORANDUM

TO: Missouri Public Service Commission Official Case File,
Case No. GR-2013-0257, File No. YG-2013-0223
Summit Natural Gas

FROM: Henry E. Warren, Energy Unit – Tariffs/Rate Design

/s/ Thomas M. Imhoff 11/09/2012
Energy-Tariff/Rate Design/Date

/s/ Robert S. Berlin 11/09/2012
Staff Counsel's Office/Date

SUBJECT: Staff Recommendation for the Summit Natural Gas Scheduled Winter Season
PGA Filing – Proposed Effective Date November 17, 2012

DATE: November 9, 2012

On November 2, 2012, Summit Natural Gas (Summit or Company) of Littleton, Colorado, filed tariff sheets bearing an effective date of November 17, 2012. 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 2012 through March 2013.

March 5, 2012, the Commission granted Missouri Gas Utility's application for name change to Summit Natural Gas of Missouri, Inc.

For Summit's Northern Service Area (serving communities of Hamilton, Gallatin and Coffey plus the adjacent certificated service areas), this filing will decrease the firm PGA factor for all firm customers for the upcoming heating season to \$0.3955 per hundred cubic feet (Ccf), from the current firm PGA factor of \$0.4989 per Ccf. This represents a decrease of \$0.1034 per Ccf for all firm customers.

For Summit's Southern Service Area and Lake of the Ozarks Service Areas (serving communities such as Warsaw and Cole Camp), this filing will decrease the firm PGA factor for all firm customers for the upcoming heating season to \$0.4170 per hundred cubic feet (Ccf), from the current firm PGA factor of \$0.5364 per Ccf. This represents a decrease of \$0.1194 per Ccf for all firm customers.

Case No. GR-2013-0257, under which these changes were consolidated into and filed, was established to track the Company's PGA factors to be reviewed in its 2011-2012 ACA filing. Case No. GR-2012-0115 was established to track the Company's PGA factors to be reviewed in its 2010-2011 ACA filing. These rate changes should be made on an interim, subject to refund status, pending final Commission decisions in ACA Case Nos. GR-2012-0115 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 20, 2013.

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.

Staff has reviewed this filing and has concluded that it was calculated in conformance with Summit'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 Summit'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 November 2, 2012, be approved, interim subject to refund:

P.S.C. MO. No.1

Twelfth Revised Sheet No. 51, Cancels Eleventh Revised Sheet No. 51
Sixth Revised Sheet No. 52, Cancels Fifth Revised Sheet No. 52

BEFORE THE PUBLIC SERVICE COMMISSION

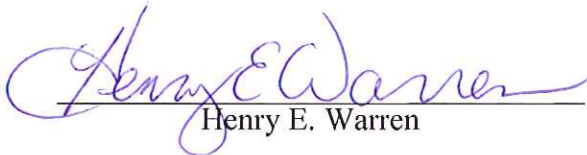
OF THE STATE OF MISSOURI

In the Matter of Summit Natural Gas of)	Case No. GR-2013-0257
Missouri, Inc.'s Purchased Gas)	File No. YG-2013-0223
Adjustment)	

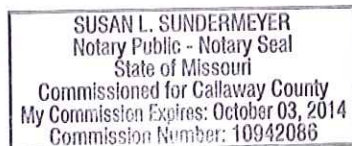
AFFIDAVIT OF HENRY E. WARREN

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Henry E. Warren, 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.


Henry E. Warren

Subscribed and sworn to before me this 9th day of November, 2012.




Notary Public