

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

In the Matter of)	
Summit Natural Gas of Missouri, Inc.'s)	<u>File No. GR-2014-0097</u>
Purchased Gas Adjustment)	Tracking No. YG-2014-0180

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 a tariff sheet with an effective date of November 1, 2013, to reflect changes in SNG’s purchased gas adjustment (PGA) factors. On October 16, 2013, SNG filed a substitute tariff sheet. 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 sheet applies to SNG’s service territory previously known as Southern Missouri Natural Gas.¹ Staff has determined that the rates in the proposed tariff sheet were calculated according to SNG’s PGA clause.

¹ SNG separately filed similar tariff sheets for its Northern and Southern territories in Case No. GR-2014-0096.

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 this tariff sheet on less than 30 days' notice.

WHEREFORE, Staff respectfully recommends the following tariff sheet 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. 2

Original Sheet No. 27, Cancelling P.S.C. MO No. 1 30th Revised Sheet No. 27

Respectfully Submitted,

/s/ John D. Borgmeyer

John D. Borgmeyer
Deputy Legal Counsel
Missouri Bar No. 61992
Attorney for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102
Telephone: (573) 751-5472
Fax: (573) 751-9285
Email: john.borgmeyer@psc.mo.gov

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,
File No. GR-2014-0097, Tariff File No. YG-2014-0180,
Southern Missouri Gas Company d/b/a Southern Missouri Natural Gas
Company, L.P.

FROM: Michelle Bocklage, Energy Department - Tariffs/Rate Design

/s/ Thomas M. Imhoff 10/23/13
Energy Unit/Date

/s/ John D. Borgmeyer 10/23/13
Staff Counsel's Office/Date

SUBJECT: Staff Recommendation on Summit Natural Gas of Missouri, Inc.'s Scheduled Winter
PGA Filing for the territory previously known as Southern Missouri Natural Gas,
L.P. Effective November 1, 2013

DATE: October 23, 2013

On October 15, 2013, Summit Natural Gas of Missouri, Inc. (SNG or Company) of Littleton, Colorado, filed a tariff sheet with a proposed effective date of November 1, 2013. On October 16, 2013, SNG filed a substitute tariff sheet. The tariff sheet was filed to reflect changes in SNG's Purchased Gas Adjustment (PGA) factor and changes in the Actual Cost Adjustment (ACA) factor for the upcoming heating season of November 2013 – March 2014.

The net effect of this change will decrease the Total PGA factor to \$0.5754 per hundred cubic feet (Ccf) from the Total PGA factor of \$0.6290 per Ccf currently in effect. This represents a decrease of \$0.0536 per Ccf.

Case No. GR-2014-0097, under which this change was filed, was established to track SNG's PGA factors to be reviewed in its 2012-2013 ACA filing. Case No. GR-2013-0256 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-2013-0256 and GR-2013-0257.

Due to the limited time available to review the documentation supporting the ACA factor submitted 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.

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

MO PSC Case No. GR-2014-0097
OFFICIAL CASE FILE MEMORANDUM
PAGE 2 OF 2

Staff has determined that the rates on the proposed tariff sheet were 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 sheet be approved on an interim basis, subject to refund:

P.S.C. MO No. 2

Original Sheet No. 27, Cancelling P.S.C. MO No. 1 30th Revised Sheet No. 27

