

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

In the Matter of Summit Natural Gas of)
Missouri, Inc., Changes to Company's)
Purchase Gas Adjustment (PGA))
Clause)

Case No. GR-2022-0191
Tracking No. JG-2023-0087

STAFF RECOMMENDATION

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

1. On November 2, 2022, Summit Natural Gas of Missouri, Inc. (“SNGMO”) filed three tariff sheets bearing effective dates of November 21, 2022, Tariff File No. JG-2023-0087, an accompanying cover letter, and supporting worksheets. On November 4, 2022, SNGMO filed three substitute tariff sheets bearing effective dates of November 17, 2022.

2. The tariff sheets was filed to reflect changes in SNGMO’s Purchased Gas Adjustment (“PGA”) factors as a result of estimated changes in the cost of natural gas. Also included in this filing is the annual change to the Actual Cost Adjustment (“ACA”).

3. The Commission issued an order on November 3, 2022, directing Staff to file a recommendation regarding SNGMO’s tariff sheets, Tariff File No. JG-2023-0087, no later than November 15, 2022.

4. On November 10, 2022, SNGMO again filed three substitute tariff sheets, bearing effective dates of November 17, 2022, and noted in its accompanying cover letter that these substitute revised tariff sheets were filed to correct errors identified by Staff.

5. Staff has reviewed SNGMO's filing and has determined it was calculated in conformance with SNGMO's PGA Clause. Staff does not oppose the approval of these tariff sheets on less than thirty (30) days' notice. Such action is supported by SNGMO's Commission-approved PGA clause allowing for notice of ten (10) business days for PGA change (both increases and decreases) filings. Therefore, Staff recommends the Commission approve the revised substitute tariff sheets (No. JG-2023-0087), filed on November 10, 2022, on an interim basis, subject to refund, for service on and after November 17, 2022.

6. Due to the limited time available to review the documentation supporting the ACA factor submitted in this filing, Staff requests permission to submit its results and recommendations regarding the information included in this ACA filing to the Commission on or before December 15, 2023.

WHEREFORE, for the foregoing reasons and those stated in Staff's Memorandum attached hereto, Staff recommends that the Commission issue an order approving SNGMO's revised substitute tariff sheets in Tracking No. JG-2023-0087 as listed below, on an interim, subject to refund status; and further order Staff to file its recommendation SNGMO's ACA filing no later than December 15, 2023.

P.S.C. MO No. 3

10th Revised Sheet No. 56, Cancelling 9th Revised Sheet No. 56

10th Revised Sheet No. 57, Cancelling 9th Revised Sheet No. 57

10th Revised Sheet No. 58, Cancelling 9th Revised Sheet No. 58

Respectfully submitted,

/s/ Jamie S. Myers

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Attorney for Staff of the
Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record on this 15th day of November, 2022.

/s/ Jamie S. Myers

MEMORANDUM

TO: Missouri Public Service Commission Official Case File,
File No. GR-2022-0191, Tariff No. JG-2023-0087
Summit Natural Gas of Missouri, Inc.

FROM: Kimberly K.Tones, Lead Senior Utility Regulatory Auditor
- Procurement Analysis Dept.

/s/ David M. Sommerer 11/15/2022 /s/ Jamie Myers 11/15/2022
Financial and Business Analysis Div./Date Staff Counsel's Office/Date

SUBJECT: Staff Recommendation for Summit Natural Gas of Missouri, Inc. Scheduled Winter
PGA Filing Effective Date November 17, 2022

DATE: November 15, 2022

On November 2, 2022, Summit Natural Gas of Missouri, Inc. (“SNGMO” or “Company”), filed three tariff sheets bearing a proposed effective date of November 21, 2022, Tariff No. JG-2023-0087. In addition, SNGMO filed a single cover letter and supporting worksheets. On November 4, 2022, SNGMO filed three substitute tariff sheets bearing a proposed effective date of November 17, 2022, a single cover letter and revised supporting worksheets. On November 10, 2022, SNGMO filed a revised substitute filing containing revised tariff sheets (3) bearing a proposed effective date of November 17, 2022, and a single cover letter. The revised substitute tariff sheets were filed to reflect changes in SNGMO’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) factors.

On November 3, 2022, the Commission issued its “**Order Directing Expedited Staff Recommendation and Setting Time for Responses**”. The order directs Staff to file its recommendation no later than November 15, 2022.

The filing revises the following existing tariff pages:

P.S.C. MO No. 3, 9th Revised Sheet No. 56
P.S.C. MO No. 3, 9th Revised Sheet No. 57
P.S.C. MO No. 3, 9th Revised Sheet No. 58

This filing proposes increases in Regular Purchased Gas Adjustment (RPGA) rates for all customer classes by division as noted below:

Division	Current		Current	
	RPGA	ACA	Total PGA	
Gallatin	\$ 0.5975	\$ 0.0563	\$ 0.6538	
Warsaw/Lake of the Ozarks	\$ 0.6822	\$ 0.3047	\$ 0.9869	
Rogersville/Branson	\$ 0.6622	\$ 0.3320	\$ 0.9942	

Division	Proposed		Proposed	
	RPGA	ACA	Total PGA	
Gallatin	\$ 1.0689	\$ 0.0894	\$ 1.1583	
Warsaw/Lake of the Ozarks	\$ 0.8917	\$ 0.5492	\$ 1.4409	
Rogersville/Branson	\$ 0.8869	\$ 0.5178	\$ 1.4047	

Division	RPGA	RPGA	Increase/
	Current	Proposed	(Decrease)
Gallatin	\$ 0.5975	\$ 1.0689	\$ 0.4714
Warsaw/Lake of the Ozarks	\$ 0.6822	\$ 0.8917	\$ 0.2095
Rogersville/Branson	\$ 0.6622	\$ 0.8869	\$ 0.2247

SNGMO’s revised cover letter makes the following representations:

These revised sheets include changes made pursuant to Company’s Purchased Gas Adjustment (PGA) Clause as approved by the Commission. These revisions reflect adjustments to the RPGA¹ and Actual Cost Adjustment (ACA) factors.

The changes in the PGA factors applicable to the Company’s Gallatin Division will increase the firm sales customers’ Total PGA from \$0.6538/Ccf to \$1.1583/Ccf. The proposed increase will cause an average winter month residential gas bill to increase by approximately \$65.27. This represents a 36.26% increase for the average month in the heating season.

The changes in the PGA factors applicable to the Company’s Warsaw and Lake of the Ozarks Divisions will increase the sales customers’ Total PGA from \$0.9869/Ccf to \$1.4409/Ccf. The proposed increase will cause an average winter month residential gas bill to increase by approximately \$25.51. This represents a 19.77% increase for the average month in the heating season.

The changes in the PGA factors applicable to the Company’s Rogersville and Branson Divisions will increase the firm sales customers’ Total PGA from \$0.9942/Ccf to \$1.4047/Ccf. The proposed increase will cause an average winter month residential gas bill to increase by approximately \$39.35. This represents a 20.85% increase for the average month in the heating season.

¹ (RPGA +ACA = Total PGA)

Case No. GR-2022-0191, under which these changes were filed, was established to track SNGMO's PGA factors to be reviewed in its 2021-2022 ACA filing. Case No. GR-2022-0122 was established to track the Company's PGA factors to be reviewed in its 2020-2021 ACA filing. These rate changes should be made on an interim basis, subject to refund pending final Commission decisions in ACA Case No. GR-2022-0122 (2020-2021 ACA filing) and ACA Case No. GR-2022-0191 (2021-2022 ACA filing).

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.

Due to the limited time available to review the documentation supporting the ACA factors submitted in this filing, the Procurement Analysis Department (PAD) requests permission to submit its results and recommendations regarding the information included in this ACA filing to the Commission on or before December 15, 2023.

Staff has reviewed this filing and determined that the rates on the proposed tariff sheets were calculated in conformance with SNGMO's PGA Clause. Staff asks the Commission to take notice of SNGMO's tariff language that allows for approval of these tariff sheets on less than thirty (30) days' notice is demonstrated by SNGMO's Commission-approved PGA clause allowing for ten (10) business days' for PGA change filings. Therefore, Staff recommends that the following revised tariff sheets filed on November 2, 2022, as substituted on November 4 and 10, and effective on November 17, 2022, be approved on an interim basis, subject to refund:

P.S.C. MO No. 3

10th Revised Sheet No. 56, Cancelling 9th Revised Sheet No. 56

10th Revised Sheet No. 57, Cancelling 9th Revised Sheet No. 57

10th Revised Sheet No. 58, Cancelling 9th Revised Sheet No. 58

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Summit Natural Gas of)
Missouri, Inc., Changes to Company's) File No. GR-2022-0191
Purchase Gas Adjustment "PGA" Clause)

AFFIDAVIT OF KIMBERLY K. TONES, CIA, CPA

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW KIMBERLY K. TONES, CIA, CPA and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation* in Memorandum form; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.



KIMBERLY K. TONES

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 14th day of November 2022.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2025
Commission Number: 12412070



Notary Public