

rates authorized in the Lake of the Ozarks CCN, Case No. GA-2012-0285, for each rate district on a going-forward basis.

F. Should SNGMO make an adjustment to its depreciation reserves in the former MGU districts as recommended by Staff?

Yes.

G. Should SNGMO make an adjustment to Account 302?

Yes, SNGMO is booking CWIP into Account 302. Therefore, additional adjustments are needed to show the original cost of the Franchises in Account 302 (Roth Surrebuttal, page 4, lines 1 – 8).

H. Should the Commission require SNGMO to impute a level of volumes, customer levels, and/or revenues in any of the four rate divisions in this rate case?

Yes. (Meisenheimer Rebuttal pages 5-19; Meisenheimer Surrebuttal pages 6-9).

I. How should the former SMNG assets be booked to plant in service in light of MGU's merger with SMNG that was approved in GM-2011-0354?

The former SMNG assets should be booked to plant at the lower actual purchase price rather than original recorded book value (Roth Rebuttal HC, page 9, lines 10 - 17).

Misc. Tariff Issues

A. Should the Commission approve SNGMO's proposed Conversion Program?

No. (Meisenheimer Rebuttal pages 54-56).

B. What conversion costs should SNGMO be required to charge?

The cost of a Conversion Program should not be recovered from ratepayers (Meisenheimer Rebuttal page 54).

Rate Design

A. What is “rate shock”? If it exists, should the Commission address rate shock in this case and, if so, how?

In this proceeding Public Counsel did not provide a specific definition of rate shock. Public Counsel does take the position that the rates proposed by the Staff and Company are excessive and negatively impact affordability (Meisenheimer Rebuttal pages 27-47). The Commission can address rate shock in this case by adopting Public Counsel’s recommendations on revenue requirement and rate design.

B. How should any rate increase/decrease be applied to volumetric and monthly charges?

The Commission should not approve a general increase in base rates for the reasons discussed in the testimony of Public counsel witness Barbara Meisenheimer (Meisenheimer Rebuttal pages 5-27; Meisenheimer Surrebuttal pages 2-9). The Commission should approve a limited uniform increase to base rates to recover the cost of the low-income weatherization expenditures as discussed in the rebuttal testimony of Public Counsel’s witness, Geoff Marke (Meisenheimer Rebuttal pages 1-2).

C. What billing determinants should be used for ratemaking purposes?

The billing units agreed to by the Staff and Company can be used for the purpose of calculating current revenue and any adjustment for low-income weatherization (Meisenheimer Surrebuttal page 2).

Energy Efficiency/Low Income Weatherization Programs

A. Should the Commission approve an Energy Efficiency Collaborative for SNGMO?

Yes, but only if formed with the goal of proactively working towards the creation of a viable energy efficiency program that would benefit ratepayers (Geoff Marke Rebuttal and Surrebuttal Testimonies).

B. What programs, if any, should the Commission authorize?

The Commission should authorize a weatherization program only. A larger dialogue needs to take place with interested parties and possibly other utilities for an energy efficiency program to make sense for SNG's ratepayers under today's operating restraints (Geoff Marke Rebuttal and Surrebuttal Testimonies).

C. What funding level, if any, should the Commission authorize?

The weatherization program should be funded at a level of \$30,000 annually (Geoff Marke Rebuttal and Surrebuttal Testimonies).

D. How should SNGMO recover funding for any programs?

Weatherization program funding should be recovered through rates (Barb Meisenheimer Rebuttal Testimony).

E. Should the Commission direct SNGMO to enter into a funding agreement with the Division of Energy for administration and monitoring of programs?

No. (Geoff Marke Rebuttal and Surrebuttal Testimonies).

F. If the Commission approves an energy efficiency program, what measures should be included in the program?

If the Commission approves an energy efficiency program, only cost-effective measures approved by an Energy Efficiency Collaborative should be included (Geoff Marke Rebuttal and Surrebuttal Testimonies).

WHEREFORE, the Office of the Public Counsel respectfully submits this statement of positions.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this August 15, 2014:

/s/ Marc Poston
