

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
GR-2022-0122, Summit Natural Gas of Missouri, Inc.

FROM: Kwang Y. Choe, PhD, Economics Analyst – Procurement Analysis
Jacob R. Robinett, Associate Engineer – Procurement Analysis
Kimberly K. Tones, CPA, CIA, Lead Sr. Utility Regulatory Auditor – Procurement Analysis

/s/ David M. Sommerer 12/14/22 /s/ Jamie S. Myers 12/14/22
Project Coordinator / Date Staff Counsel’s Office / Date

/s/ David T. Buttig, PE 12/14/22
Senior Professional Engineer / Date

SUBJECT: Staff Recommendation in Case No. GR-2022-0122, Summit Natural Gas of Missouri, Inc. 2020-2021 Actual Cost Adjustment Filing

DATE: December 14, 2022

EXECUTIVE SUMMARY

On November 4, 2021, Summit Natural Gas of Missouri, Inc. (“Summit” or “Company”) filed its Actual Cost Adjustment (ACA) for the 2020-2021 annual period for rates to become effective November 15, 2021. This filing revised the ACA rates based upon the Company’s calculations of the ACA balance for the 2020-2021 period. Summit filed three proposed substitute tariff sheets with the latest version filed November 23, 2021, with the proposed effective date of December 8, 2021.¹ The Commission approved those rates on an interim subject to refund basis, with an effective date of December 8, 2021.

The Procurement Analysis Department (“Staff”) of the Missouri Public Service Commission reviewed the Company’s ACA filing. Staff’s analysis consisted of:

1. A review and evaluation of the Company’s billed revenues and its natural gas costs for the period of September 1, 2020 to August 31, 2021;
2. A reliability analysis of the Company’s estimated peak day requirements and the capacity levels to meet those requirements;
3. An examination of the Company’s gas purchasing practices to determine the prudence of the Company’s purchasing decisions; and
4. A hedging review to evaluate the reasonableness of the Company’s hedging practices for this ACA period.

¹ The substitute tariff sheets were filed on November 23, 2021, to correct a typographical error.

Based on Staff’s review, adjustments to the Company’s filed ACA balances have been recommended to reflect the actual billed revenues, less natural gas costs, for the period under review. Please see the Recommendations section for adjusted ACA balances and Staff’s recommendations.

STAFF’S TECHNICAL DISCUSSION AND ANALYSIS

Staff’s discussion of its findings is organized into the following six sections, which include Staff’s concerns and recommendations:

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I. OVERVIEW

Service Area

During the 2020-2021 ACA period, Summit provided natural gas service to customers in three defined service areas: Rogersville/Branson (“Rogersville”), Warsaw/Lake of the Ozarks (“Warsaw/LOO”), and Gallatin. The Rogersville Service Area includes the counties of Greene, Webster, Wright, Douglas, Texas, Howell, Laclede, Christian, Barry, Lawrence, Taney, and Stone. The Warsaw/LOO Service Area includes Benton, Camden, Greene, Miller, Morgan and Pettis Counties. The Gallatin Service Area includes the counties of Harrison, Daviess, and Caldwell.

The Rogersville Service Area served an average of 12,203 sales customers during the ACA period under review, while the Warsaw/LOO Service Area served an average of 4,705 customers. Both the Rogersville and Warsaw/LOO Service Areas are supplied by the Southern Star Central Gas Pipeline (SSCGP). Neither Rogersville nor Warsaw/LOO Service Areas currently contract for storage. The Gallatin Service Area served an average of 1,626 sales customers during the ACA period, and the ANR Pipeline Company (“ANR”) serves all customers in Gallatin Service Area.

The total sales customer count for all service areas is an average of 18,534 customers.

II. BILLED REVENUE AND ACTUAL GAS COSTS

ACA Balances

ACA balances are cumulative such that the ending balance of one period becomes the beginning balance of the next period. In this period, the Company’s beginning ACA balance for each service area agrees with the Commission’s Order in Case No. GR-2021-0124.

Billed Revenues

For each service area, Staff reviewed a sample of customer bills to ensure the PGA/ACA rates charged for natural gas reflected Commission approved PGA/ACA rates. All rates charged to natural gas consumers agreed with approved rates, excluding transportation customers. In addition, Staff recalculated monthly billed revenue, applying approved rates to volumes of natural gas consumed. Further, Staff tested the reasonableness of total revenues reported by comparing the total natural gas volumes billed to the sum of natural gas volumes purchased, plus/minus changes in inventory and lost and unaccounted natural gas summaries. Staff does not recommend any adjustment to billed revenues based on testing performed.

Natural Gas Costs

Summit submitted invoices for all natural gas purchases made during the review period. Staff compared each natural gas invoice to Summit’s ACA filing by service area. For the Gallatin Service Area, Staff also reconciled and recalculated storage balances, injections/withdrawals, and weighted average cost of gas (WACOG). On a test basis, Staff also verified invoiced natural gas rates to gas supply contracts or other referenced rate sources, such as First of Month (FOM) pricing, pipeline tariff, etc. Based on testing, natural gas costs were adjusted to exclude late payment charges and reclassified commodity costs allocated between the Rogersville and Warsaw/LOO Service Areas. For additional information on natural gas purchases, please see section V. Winter Storm Uri.

Natural Gas Purchase Adjustments - Commodity			
Service Area	Reported	Corrected	(Over)/ Under Stated
Rogersville/Branson	\$ 27,907,319.04	\$ 27,909,764.10	\$ 2,445.06
Warsaw/LOO	\$ 9,528,900.70	\$ 9,526,455.14	\$ (2,445.56)
Gallatin	\$ 1,502,146.21	\$ 1,502,146.21	\$ -

Natural Gas Purchase Adjustments - Interest Charges			
Service Area	Reported	Corrected	(Over)/ Under Stated
Rogersville/Branson	\$ 2,465,529.88	\$ 2,465,461.36	\$ (68.52)
Warsaw/LOO	\$ 645,494.06	\$ 645,425.53	\$ (68.53)
Gallatin	\$ 158,529.63	\$ 158,529.63	\$ -

Imbalance/Cash Outs

Summit’s transportation tariffs contain a cash out provision which reconciles a transportation customer’s imbalance by requiring Summit to either buy (shown as a billing credit) or sell (shown as a billing charge) gas to the transportation customer equal to the customer’s monthly imbalance². A billing credit increases gas costs whereas a billing charge reduces gas costs. Staff recalculated imbalances and cash out calculations, on a test basis, and compared the recalculated charges/credits to transportation customer invoices and the ACA filing, noting several discrepancies between the amounts calculated, billed, and included in the ACA filing. Staff also compared the calculated cash outs to the sample of transportation customer bills provided, with discrepancies noted. The majority of discrepancies related to cash out recalculations were due to formula and pricing errors within the cash out workbooks. Discrepancies between calculated cash outs and billed cash outs were primarily the result of billing adjustments from prior periods. Testing was expanded to 1) recalculate each transportation customer’s monthly cash out charge/credit, and 2) review transportation customer bills for prior period billing adjustments. Recalculated cash outs decreased gas costs \$47,165 Rogersville, \$52 Warsaw/LOO, and \$23,618 Gallatin Service Areas.

Additionally, due to a meter classification error (manual versus electronic read) and incorrect meter number assignment, a transportation customer in the Rogersville Service Area had not been billed for natural gas consumed at this meter location from 2018 through February 2021. Summit provided meter readings for the missing meter from 2018 through the end of the ACA period. Using pricing information from cash out workbooks from 2018 through February 2021, Staff calculated the value of the natural gas consumed at this meter to be \$540,413.

The following table summarizes the effects of the recalculated cash outs on the ACA ending balance.

Imbalance/Cash Out Adjustments			
Service Area	Reported	Corrected	(Under)/ Over Stated
Rogersville/Branson	\$ (1,698,489.59)	\$ (2,286,068.13)	\$ (587,578.54)
Warsaw/LOO	\$ (416,049.34)	\$ (416,101.01)	\$ (51.67)
Gallatin	\$ (290,774.92)	\$ (314,393.09)	\$ (23,618.17)

Carrying (Interest) Cost

In mid-July 2022, a Unanimous Stipulation and Agreement was reached regarding the treatment of Carrying Cost associated with the February 2021 cold weather event, Winter Storm Uri. Consistent

² “Balancing” by a transportation customer or a pool of transportation customers means that the amount of gas put into Summit’s system (receipts) is made equal to the amount used or taken out of Summit’s system (deliveries). When a transportation customer puts more or less gas into Summit’s system than it uses, this is referred to as an “imbalance.”

with Summit’s PGA Clause, interest was computed based upon the average of the accumulated beginning and ending monthly over/under recoveries in excess of +/- \$50,000 with interest charged at prime rate less 2%. Any changes to either billed revenues or natural gas cost will impact monthly over/under recovery balances. Incorporating the adjustments noted above, the impacts to carrying costs are summarized in the table below.

Carrying Cost Adjustments			
Service Area	Reported	Corrected	(Over)/ Under Stated
Rogersville/Branson	\$ 152,835.99	\$ 149,377.69	\$ (3,458.30)
Warsaw/LOO	\$ 50,810.44	\$ 50,809.56	\$ (0.88)
Gallatin	\$ 3,176.63	\$ 2,973.96	\$ (202.67)

Other Matters

Best Practices

Between the cash out formula/pricing errors, failure to recognize prior period billing adjustments related to cash outs in the ACA balance, missing meter readings and related billings for multiple years, and an increasing lost and unaccounted fuel percentage may indicate insufficient oversight over the revenue cycle. Staff recommends Summit complete an internal audit addressing concerns noted including, but not limited to, a complete review to ensure all active meters are billed and all prior period billing adjustments are reflected in the ending ACA balance.

III. RELIABILITY ANALYSIS AND GAS SUPPLY PLANNING

As a gas corporation providing natural gas service to Missouri customers, the Company is responsible for conducting reasonable long-range supply planning and the decisions resulting from that planning. One purpose of the ACA process is to examine the reliability of the Local Distribution Company’s (LDC) gas supply, transportation, and storage capabilities. For this analysis, Staff reviews the LDCs plans and decisions regarding estimated peak day requirements and the capacity levels to meet those requirements, peak day reserve margin and the rationale for this reserve margin, and natural gas supply plans for various weather conditions.

Staff’s review for Summit’s service areas produced the following comments and concerns:

Reserve Margins

The reserve margin for Branson is ** [REDACTED] ** and ** [REDACTED] ** for Rogersville when considering the upper 95% confidence interval. The reserve margin for the Gallatin Service Area is ** [REDACTED] **, and the reserve margin for the Warsaw/LOO Service Area is ** [REDACTED] ** when considering the upper 95% confidence interval. The Branson and Warsaw/LOO Service Areas are relatively new and are experiencing variable growth. They are small systems, and interstate pipelines

do not readily accommodate the levels of capacity or capacity adjustment that a small, growing system might prefer. Staff finds that the high reserve margins in the Branson District and the Southern Service Area are reasonable in light of these circumstances. Staff encourages the Company to continue to monitor its pipeline contracts and maintain an appropriate reserve margin for each service area.

** [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] **

Staff recommends the company continue to analyze the options and update Staff on the solution to the negative reserve margin in the Gallatin Service Area.

Contract Capacity

The reserve margin for the Warsaw/LOO Service Area is at a ** [REDACTED] ** when considering the upper 95% confidence interval. The area is served by two contracts, for a total of ** [REDACTED] ** of primary firm daily transport capacity on SSCGP. After releasing ** [REDACTED] ** of the capacity to the Missouri School Board Association, Summit's available firm capacity for the winter 2020-2021 will be ** [REDACTED] ** per day. ** [REDACTED]

[REDACTED] **

Staff recommends the Company explore the option of continuing to post excess firm capacity for release on the SSCGP's electronic bulletin board, until the time comes when the Company can negotiate a reasonable capacity adjustment.

IV. HEDGING

Summit's winter hedging plans are primarily designed to achieve a reliable natural gas supply and to protect its customers against price spikes. The hedging plan establishes known prices for ** [REDACTED] ** of normal winter (November – March) weather requirements for each of Summit's three service areas.

The hedging plan for the Rogersville Service Area is to utilize fixed price purchases for this ACA period. Staff notes that Summit's storage agreement for the Rogersville Service Area expired in April 2016.

For the Company's Warsaw/LOO Service Area, the hedging plan is to utilize fixed price purchases. The Company does not contract for storage capacity for this service area.

Summit's hedging plan for its Gallatin Service Area calls for Summit to fill storage as close to its maximum capacity as possible by November 1, which is the beginning of the winter heating season. Similar to the Rogersville Service Area, fixed price purchases are a part of the hedging plan for the Gallatin Service Area.

For the Rogersville Service Area, Summit purchased fixed price volumes in June 2020 for delivery during the winter period of November 2020 through March 2021. These fixed price volumes represent about ** [REDACTED] ** of normal winter weather requirements for the former Southern Missouri Natural Gas service area. In light of the April 2016 expiration of the Rogersville Service Area storage contract, Summit should continue to review the effects on hedging from this expiration. Staff notes that the Company, in its recent storage update, indicated that there is potential for the Rogersville Service Area storage contract. Staff will continue to monitor.

Summit purchased fixed price volumes in June 2020, for delivery in the periods of November 2020 through March 2021, for the Warsaw/LOO Service Area. The fixed price volumes represent about ** [REDACTED] ** of normal winter weather requirements for this service area.

Summit's maximum storage quantity (MSQ) for the Gallatin Service Area represents about ** [REDACTED] ** of normal winter (November – March) weather requirements. Summit's actual storage injection by November 1, 2020 was about 92% of MSQ. Summit also purchased fixed price volumes in June 2020 for delivery during the periods of November 2020 through March 2021. These fixed price volumes, which represent about ** [REDACTED] ** of normal winter weather requirements, combined with actual storage at the beginning of the winter season, represent about ** [REDACTED] ** of normal winter weather requirements for the Gallatin Service Area.

Conclusion

Staff has the following comments about the Company's hedging practices for this ACA's winter period:

1. It is important for Summit to evaluate the expected level of the customers' natural gas requirements that are reasonably protected (hedged) under warmer than normal, normal, and colder than normal weather scenarios.
2. Summit should evaluate its hedging strategy in response to the changing market dynamics as to how much the existing hedging strategy actually benefits its customers while achieving the goal of stable price level.
3. A part of Summit's hedging goals is to capture the lowest price. However, this market-timing approach can lead to a situation where Summit waits too long for natural gas prices to go down until it perceives them to be favorable while running the risk of higher prices.

4. A part of Summit's hedging strategy utilizing storage based on its plan of filling storage to its MSQ by November 1 and use of the entire MSQ by the end of March could potentially overestimate an actual hedging outcome as the Company typically does not fill storage to MSQ and finishes the last month of the winter heating season (March) with a portion of MSQ left in storage.

Hedging Recommendations

Staff recommends, for the 2020-2021 ACA period, and beyond, that the Company:

1. Establish and maintain a current and consistent hedging policy with stated objectives based on month-specific normal weather requirements while also considering the impacts of warmer and colder than normal weather scenarios.
2. Consider a combination of various alternatives such as storage withdrawals, call options, and other fixed price purchases for effective hedging during the winter months.
3. Establish what is a realistic amount of MSQ that the Company plans to inject into storage by November 1 and to withdraw by March 31. Thus, determine a realistic amount of storage that can be utilized toward hedging and calculate the hedging percent utilizing storage and the overall hedging percent accordingly.
4. Continue to monitor the market movements diligently and with regard to timing of hedge placements employ disciplined (time-driven) as well as discretionary (price-driven) approaches in its hedging practices.
5. Continue to document its reasoning for executing any hedging transactions or decisions, whether by means of storage, fixed price contracting or other financial hedging instruments.

V. WINTER STORM URI

Beginning on or around February 6, 2021, an Arctic air mass enveloped much of the continental United States with temperatures experienced throughout the Midwest well below normal between February 8 and February 18, 2021. Planning for the February 2021 Cold Weather Event known as Winter Storm Uri began Friday, February 5, 2021, with the Gas Supply teams meeting to review the upcoming extreme weather projected. On February 8, 2021, Summit began receiving cold weather notices from SSCGP and other pipelines. Staff reviewed Summit's actions and decisions as it related to Winter Storm Uri, February 5th through February 20th, including review of natural gas purchases, storage utilization, and hedging activities. Based on information taken from various data requests, including but not limited to Staff DR No. 0110, and Staff observations, the following is a summary of key actions taken by Summit.

On or around February 10, 2021, Gas Supply met with SSCGP to identify new supply points with one location Summit's suppliers could deliver firm gas and Summit contracted for 2,900/day of incremental firm capacity for the remainder of February.

On February 11, 2021, Gas Supply confirmed that the peaking demand for Missouri for the upcoming weekend would be severe, particularly on Monday, February 15, 2021, and worked with Summit Gas Control, Engineering and Operations to determine the required supply nominations to support system conditions for the upcoming long weekend. On the afternoon of February 11, 2021, Gas Supply executed deals for gas supply for the holiday weekend.

On the evening of February 11, 2021, natural gas index prices for the following day were posted and SSCGP spiked to \$44.78/MMBtu. On Friday (February 12, 2021), Midcontinent natural gas index prices began skyrocketing and Summit began exploring options to save costs on daily-index priced supply.

Summit reduced its Rogersville system nomination on February 12, 2021 by 500 MMBtu at the request of SSCGP, to match the Rogersville station design capacity of ** [REDACTED] ** MMBtu per day. Summit also had Compressed Natural Gas (CNG) storage trailers prepared to inject CNG into its Rogersville system in the event of operational concerns regarding system performance. However, once it was determined that the gas was no longer necessary for system performance, the CNG was utilized instead for "peak shaving" to supplement pipeline gas purchases, as the CNG was significantly less expensive.

In the early morning hours of Sunday, February 14, 2021, the Diggins compressor had a maintenance issue that required Gas Control/Ops to switch on the new Rogersville compressor. The compressors were set at a daily flow rate of ** [REDACTED] ** MMBtu, and Summit had a total system nomination of ** [REDACTED] ** (industrial nominations included). Later that same day, Summit started seeing gas supply cuts on SSCGP as production from various pools began experiencing weather-related problems. Gas Supply worked with the suppliers to attempt to move its nominations around to various supply points to attempt to avoid cuts and get the gas to flow. Suppliers notified Summit that they were uncertain about availability of gas for the next several days. Rogersville marketers were notified of the supply issues via email. Interruptible customers were restricted to heat load only beginning approximately 9:00 pm. This impacted approximately 17 customers on the Rogersville system.

On February 15, 2021, Summit continued to receive significant supply cuts (~7k Dth on SSCGP) and continued to request gas supply options from Missouri suppliers. SSCGP contacted Summit to request it reduce its takes from their system to match Summit's reduced nomination. Upon review, Summit determined that it was running close enough to its adjusted nomination that SSCGP was satisfied.

Summit's Gas Supply team reached out to Missouri marketers to ask if anyone had surplus gas to sell. Summit received one offer, from ** [REDACTED] **, for less than 1,000 Dth, which was accepted. Gas Supply executed a new contract via an emergency Risk Management Committee approval process with this supplier in order to purchase the gas for its customers. On February 17, 2021, Gas Supply executed a new contract via an emergency Risk Management Committee approval process with ** [REDACTED] **, in order to purchase SSCGP gas supply from ** [REDACTED] ** for gas days February 17, 18, and 19. During this time, no other Summit supplier had any gas to sell.

On February 18, 2021, at 9:00 am, the interruptible customers were allowed to resume service as conditions on the system had improved and the gas supply situation on SSCGP was beginning to recover.

On February 19, 2021, SSCGP lifted its OFO and conditions began to return to normal.

Prudence Standard

Under this standard, natural gas utilities' actions and decisions are evaluated based on whether each action or decision was reasonable at the time, under all the circumstances, and based on the information that was or should have been known at that time; it is not an evaluation of those actions and decisions using the benefit of hindsight. Imprudence alone is not treated as a basis for a disallowance. However, when imprudence is coupled with harm to a utility's ratepayers, then a prudence disallowance is appropriate.

Natural Gas Purchases – Rogersville Service Area

Summit did not renew its storage contract for the Rogersville/ Service Area in 2016, opting to utilize fixed contract purchases. For the November 2020-March 2021 winter heating season, Summit planned to purchase roughly ** [REDACTED] ** of its heating season fixed price contracts with the remaining ** [REDACTED] ** purchased at index prices. Staff reviewed purchases made including supporting documentation such as purchase confirmations noting several confirmations were missing. Daily indexed purchases in February 2021 represented approximately 62% of total purchases. Based on storage utilization patterns from past filings, Staff imputed the value of storage, including the annual costs associated with storage as though it had not been turned back in 2016. Assuming a storage WACOG of \$3.55 per Dth and one year's annual storage costs of ** [REDACTED] **, storage would have provided a net benefit of \$5,735,864.31 to sales customers during Winter Storm Uri. Staff recommends a disallowance of \$5,735,864.31.

Reliability and Gas Supply Planning

Summit took several steps to mitigate the impact of the Winter Storm on its customers. The actual demand was consistent with the forecast, and Summit procured sufficient gas supply to cover the system demand utilizing two new supply points identified for firm primary capacity to its city gates from: The SSCGP-EGT interconnection at Jane, MO (“EGT-Jane”), and the SSCGP-REX interconnection at St. Joseph, MO (“REX St. Joe,” aka “REX Buchanan”). Summit did not reach the peak design day on the Rogersville system; however, due to gas supply shortages upstream some of the interruptible customers were required to curtail from 9pm on February 14th to 9am on February 18th. Customers with back-up systems were instructed to switch over during this time. Transport customers served by the Warsaw system were asked to make voluntary cuts to consumption for energy conservation purposes and system integrity. There has been no changes in operations as a result from Winter Storm Uri.

VI. RECOMMENDATIONS

Staff recommends that the Commission issue an order requiring Summit to:

1. Adjust the balances in its next ACA filing to reflect Staff’s recommended ending (over)/under recovery ACA balances per the following tables:

Rogersville/Branson Description (+) Under-recovery (-) Over-recovery	Ending Balances Per Filing	Staff Adjustments for 2020-2021 ACA	Staff Recommended Ending Balances
Prior ACA Balance 8-31-20	\$ (178,195.84)	\$ 0	\$ (178,195.84)
Cost of Gas/Storage *	\$ 27,907,319.04	\$ (5,733,419.25)	\$ 22,173,899.79
Cost of Transportation	\$ 2,465,529.88	\$ (68.52)	\$ 2,465,461.36
Revenues - PGA billed	\$ (5,782,602.74)	\$ 0	\$ (5,782,602.74)
ACA Approach for Interest	\$ 152,835.99	\$ (3,458.30)	\$ 149,377.69
Cash Outs	\$ (1,698,489.59)	\$ (587,578.54)	\$ (2,286,068.13)
Total ACA Balance 8-31-21	\$ 22,866,396.75	\$ (6,324,524.62)	\$ 16,541,872.13

*Gas/Storage staff adjustment includes \$2,445.06 compliance adjustment and \$(5,735,864.31) prudence adjustment.

Gallatin Description (+) Under-recovery (-) Over-recovery	Ending Balances Per Filing	Staff Adjustments for 2020-2021 ACA	Staff Recommended Ending Balances
Prior ACA Balance 8-31-20	\$ (84,912.37)	\$ 0	\$ (84,912.37)
Cost of Gas/Storage	\$ 1,451,298.30	\$ 0	\$ 1,451,298.30
Cost of Transportation	\$ 158,529.63	\$ 0	\$ 158,529.63
Revenues - PGA billed	\$ (653,342.34)	\$ 0	\$ (653,342.34)
ACA Approach for Interest Calculation	\$ 3,176.63	\$(202.67)	\$ 2,973.96
Cash Outs	\$ (290,774.92)	\$ (23,618.17)	\$ (314,393.09)
Total ACA Balance 8-31-21	\$ 583,974.93	\$ (23,820.84)	\$ 560,154.09

Warsaw/Lake of the Ozarks Description (+) Under-recovery (-) Over-recovery	Ending Balances Per Filing	Staff Adjustments for 2020-2021 ACA	Staff Recommended Ending Balances
Prior ACA Balance 8-31-20	\$ (191,767.94)	\$ 0	\$ (191,767.94)
Cost of Gas/Storage	\$ 9,528,900.70	\$ (2,445.56)	\$ 9,526,455.14
Cost of Transportation	\$ 645,494.06	\$ (68.53)	\$ 645,425.53
Revenues – PGA billed	\$ (1,788,065.25)	\$ 0	\$ (1,788,065.25)
ACA Approach for Interest Calculation	\$ 50,810.44	\$ (0.88)	\$ 50,809.56
Cash Outs	\$ (416,049.34)	\$ (51.67)	\$ (416,101.01)
Total ACA Balance 8-31-21	\$ 7,829,322.67	\$ (2,566.64)	\$ 7,826,756.03

A positive ACA balance indicates an under-collection that must be recovered from customers. A negative ACA balance indicates an over-recovery that must be returned to customers.

2. Respond to all Staff recommendations in Section II, Billed Revenue and Actual Gas Costs; Section III, Reliability Analysis and Gas Supply Planning; and Section IV, Hedging within 30 days.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI


In the Matter of Summit Natural Gas of)
Missouri, Inc.'s Purchased Gas Adjustment) **Case No. GR-2022-0122**
Tariff Filing)

AFFIDAVIT OF KWANG Y. CHOE, PhD

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW Kwang Y. Choe, PhD, and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation*; and that the same is true and correct according to his best knowledge and belief, under penalty of perjury.

Further the Affiant sayeth not.

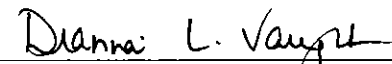


KWANG Y. CHOE, PhD

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 9th day of December, 2022.

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



Notary Public

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Summit Natural Gas of)
Missouri, Inc.'s Purchased Gas Adjustment) **Case No. GR-2022-0122**
Tariff Filing)

AFFIDAVIT OF JACOB R. ROBINETT

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW Jacob R. Robinett, and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation*; and that the same is true and correct according to his best knowledge and belief, under penalty of perjury.

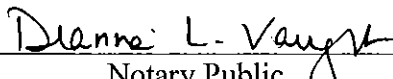
Further the Affiant sayeth not.



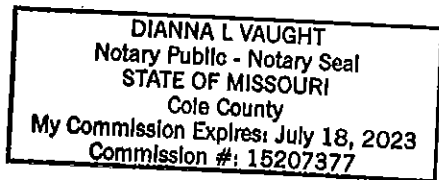
JACOB R. ROBINETT

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 12th day of December, 2022.



Notary Public



BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Summit Natural Gas of)
Missouri, Inc.'s Purchased Gas Adjustment)
Tariff Filing)
Case No. GR-2022-0122

AFFIDAVIT OF KIMBERLY K. TONES, CIA, CPA

STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

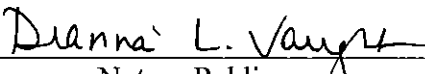
COMES NOW Kimberly K. Tones, CIA, CPA, and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation*; and that the same is true and correct according to her best knowledge and belief, under penalty of perjury.

Further the Affiant sayeth not.


_____ **KIMBERLY K. TONES, CIA, CPA**

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 12th day of December, 2022.


_____ **Notary Public**

