

**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-2022-0277

STAFF RECOMMENDATION

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

1. On June 14, 2022, Summit Natural Gas of Missouri, Inc. (“SNGMO”) filed three tariff sheets bearing effective dates of July 1, 2022, Tariff File No. JG-2022-0277, and an accompanying cover letter with supporting worksheets. The tariff sheets were filed to reflect changes in SNGMO’s Regular Purchased Gas Adjustment (“RPGA”) factors as a result of estimated changes in the cost of natural gas. The tariff sheets do not change the Actual Cost Adjustment (“ACA”) factors.

2. The Commission issued an order on June 14, 2022, directing Staff to file a recommendation regarding SNGMO’s request and corresponding tariff sheets, Tariff File No. JG-2022-0277, no later than June 21, 2022.

3. Staff has reviewed SNGMO’s filing and determined it was calculated in conformance with SNGMO’s PGA Clause and notes that optional PGA changes are authorized in SNGMO’s tariff. 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 ten (10) business days’ notice for PGA change filings.

4. Staff recommends the Commission approve the tariff sheets in Tariff File No. JG-2022-0277, on an interim basis, subject to refund, for service on and after July 1, 2022.

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 tariff sheets filed in Tariff File No. JG-2022-0277, on an interim basis, subject to refund status.

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 17th day of June, 2022.

/s/ Jamie S. Myers

MEMORANDUM

TO: Missouri Public Service Commission Official Case File,
Case No. GR-2022-0191, Tariff No. JG-2022-0277
Summit Natural Gas of Missouri, Inc.

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

/s/ David M. Sommerer 6/17/2022 /s/ Jamie Myers 6/17/2022
Financial and Business Analysis Div./Date Staff Counsel's Office/Date

SUBJECT: Staff Recommendation for Summit Natural Gas of Missouri, Inc. Optional
PGA Filing Effective Date July 1, 2022

DATE: June 17, 2022

On June 14, 2022, Summit Natural Gas of Missouri, Inc. (“SNGMO” or “Company”), filed three tariff sheets bearing a proposed effective date of July 1, 2022, Tariff No. JG-2022-0277. In addition SNGMO filed a single cover letter and supporting worksheets. The tariff sheets were filed to reflect changes in SNGMO’s Regular Purchased Gas Adjustment (RPGA) factors as the result of estimated changes in the cost of natural gas. The Actual Cost Adjustment (ACA) factors did not change as a result of this filing. This is the second Optional PGA filing made by SNGMO.

On June 14, 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 June 21, 2022.

The filing revises the following existing tariff pages:

P.S.C. MO No. 3, 8th Revised Sheet No. 56
P.S.C. MO No. 3, 8th Revised Sheet No. 57
P.S.C. MO No. 3, 8th Revised Sheet No. 58

This filing proposes increases in RPGA rates for all customer classes by division as noted below:

Division	Current RPGA	ACA	Current Total PGA
Gallatin	\$ 0.5375	\$ 0.0563	\$ 0.5938
Warsaw/Lake of the Ozarks	\$ 0.6074	\$ 0.3047	\$ 0.9121
Rogersville/Branson	\$ 0.5901	\$ 0.3320	\$ 0.9221

Division	Proposed		Proposed Total PGA
	RPGA	ACA	
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	RPGA	RPGA	Increase/ (Decrease)
	Current	Proposed	
Gallatin	\$ 0.5375	\$ 0.5975	\$ 0.0600
Warsaw/Lake of the Ozarks	\$ 0.6074	\$ 0.6822	\$ 0.0748
Rogersville/Branson	\$ 0.5901	\$ 0.6622	\$ 0.0721

SNGMO's cover letter makes following representations:

These revised sheets include changes to Company's Purchased Gas Adjustment (PGA) Clause as approved by the Commission. These revisions reflect adjustments to the Regular Purchased Gas Adjustment (RPGA)¹ factors only.

The changes in the PGA factors applicable to the Company's Gallatin Division will increase the firm sales customers' Total PGA from \$0.5938 / Ccf to \$0.6538 / Ccf. The proposed change represents a 10.1% increase.

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 \$0.9121/Ccf to \$0.9869/Ccf. The proposed change represents an 8.2% increase.

The changes in the PGA factors applicable to the Company's Rogersville and Branson Divisions will increase the firm sales customers' Total PGA from \$0.9221/Ccf to \$0.9942/Ccf. The proposed change represents a 7.8% increase.

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).

¹(RPGA +ACA = Total PGA) SNGMO emphasizes it is only the RPGA that is changing. The total PGA rates (not the Regular PGA figure) are used in the cover letter calculations.

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.

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 tariff sheets filed on June 14, 2022 and effective on July 1, 2022 be approved on an interim basis, subject to refund:

P.S.C. MO No. 3

9th Revised Sheet No. 56, Cancelling 8th Revised Sheet No. 56

9th Revised Sheet No. 57, Cancelling 8th Revised Sheet No. 57

9th Revised Sheet No. 58, Cancelling 8th Revised Sheet No. 58

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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 16th day of June 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