

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

In the Matter of Summit Natural Gas of	)	<b><u>Case No. GR-2020-0123</u></b>
Missouri, Inc., Changes to Company's	)	Tariff No. YG-2020-0073
Purchased Gas Adjustment "PGA" Clause	)	

**STAFF'S AMENDED RECOMMENDATION REGARDING SUMMIT'S  
2018-2019 ACTUAL COST ADJUSTMENT FILING**

**COMES NOW** the Staff of the Missouri Public Service Commission, through counsel, and files its amended actual cost adjustment (ACA) recommendation.

1. Summit filed for its 2018-2019 ACA on October 31, 2019. This filing contains three proposed tariff sheets and Summit's ACA account balance calculations.

2. On November 12, 2019 the Commission approved the proposed tariff sheets on an interim and refundable basis and ordered Staff to file a recommendation regarding its ACA review by December 15, 2020.

3. The Procurement Analysis Department (Staff) reviewed Summit's filing and submitted its recommendation on December 15, 2020. Staff's analysis consisted of examining the prudence of Summit's gas purchasing decisions for this ACA period, conducting a reliability analysis, and reviewing Summit's hedging practices. Staff also compared Summit's billed revenues and its actual gas costs to determine whether there is an over-recovery or under-recovery of the ACA balances.

4. On December 15, 2020 the Commission ordered Summit to respond to Staff's recommendation by January 27, 2021. Summit was granted two extensions to file its response. Summit's response is due March 23, 2021.

5. Based on Staff's discussions with SNGMO and additional documentation SNGMO provided, Staff amends its December 15 Memorandum with its Amended

Memorandum, attached as Appendix A. As detailed in the Amended Memorandum, the changes to Staff's recommendations affect the Billed Revenue and Actual Gas Costs section. There are no changes to the Reliability Analysis and Gas Supply Planning and Hedging sections of the December 15, 2020 Memorandum.

6. Staff proposes adjustments to the ending ACA balances in Summit's filing. Staff recommends the Commission issue an order establishing Summit's ending ACA balances as those in the "Staff Recommended Ending Balances" column of the table in the Amended Memorandum's Recommendations section.

**WHEREFORE**, Staff recommends the Commission issue an order establishing Summit's ending ACA account balances as of August 31, 2019 as shown in the "Staff Recommended Ending Balances" column of the table in Staff's Amended Memorandum Recommendations section.

Respectfully submitted,

**/s/ Karen E. Bretz**

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been emailed to all parties and/or counsel of record on this 19<sup>th</sup> day of March, 2021.

**/s/ Karen E. Bretz**