

2017 ACA by \$49.24 for the adjustment Staff notes for the Warsaw and Lake of the Ozarks division.

SECTION III - RELIABILITY ANALYSIS AND GAS SUPPLY PLANNING

4. **Storage Planning.** The Company agrees to continue reviewing its September and October planned storage balances in future gas supply plans to accommodate a potential warmer fall or winter. The Company notes that the gas supply plan is just a guide and that the Company is continually monitoring storage balances for changes in demand and responding accordingly.

5. **Reserve Margins.** The Company will continue monitoring its pipeline contracts and reserve margin for each division. The Company will also continue reviewing the seasonal firm gas requirements in all of its divisions, including Branson and Warsaw/Lake of the Ozarks.

SECTION IV – HEDGING

6. **Hedging Recommendations.** The Company's responses to the Staff Hedging Recommendations as follows:

a. The Company will continue to outline a specific hedging strategy in its Gas Supply Plan. This plan is provided to Staff annually and will continue to document the reasoning for transaction decisions and consider the impacts of warmer and colder than normal weather.

b. The Company considers many of the options recommended by Staff (including a combination of storage withdrawals and other fixed price purchases for effective hedging during the winter months) as a normal course of business.

c. The Company will continue to evaluate plans for storage injections and

withdrawals as part of the overall hedging strategy in its Gas Supply Plan.


d. The Company will continue to monitor the market movements with regard to timing of hedge placements and price-driven approaches in its hedging practices.

e. The Company's criteria and reasoning for its hedging transactions are documented in its Gas Supply Plan provided to Staff each May.

WHEREFORE, Summit Natural Gas of Missouri, Inc. respectfully requests that the Commission consider this response to the Staff Recommendations and issue such orders as it believes to be reasonable and just.

Respectfully Submitted,

BRYDON, SWEARENGEN & ENGLAND P.C.

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ATTORNEYS FOR SUMMIT NATURAL GAS
OF MISSOURI, INC.

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail to the following counsel this 1st day of February, 2019:

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