## **BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION**

## OF THE STATE OF MISSOURI

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In the Matter of Summit Natural Gas of Missouri Inc.'s Filing of Revised Tariffs to Increase Its Annual Revenues for Natural Gas Service

File No. GR-2014-0086 Tracking No. YG-2014-0285

## MISSOURI SCHOOL BOARDS' ASSOCIATION RESPONSE TO RECONCILLIATION ORDER SETTING DATE FOR FILING

**COMES NOW** the Missouri School Boards' Association of the Missouri Public Service Commission, by and through counsel, and pursuant to the Commission's order dated October 22<sup>nd</sup> hereby submits this response, stating:

- 1. The Commission should order the Staff to produce a similar reconciliation for non-residential school customers but using a current gas commodity market rate of \$3.75 per million Btus, rather than the PGA which is NOT applicable to transporting school customers.
- 2. An updated reconciliation for schools would provide comparable data to that provided by MSBA's Exhibit 404 which showed an increase for schools as high as 59.23 % for Lebanon schools without considering the two additional increases due to: (a) loss of the flex discount and (b) the new "Cashout" provision.
- 3. In additional to the updated reconciliation percentage increases, schools will see an additional 10% increase for loss of flex discount and an additional increase of approximately 20% due to the new cashout provision, which in aggregate was as high as 97.5% for Lebanon schools under then market prices used for Exhibit 404.
- 4. MSBA requests that the Commission give strong consideration to arguments of MSBA and OPC to address the Rate Shock issue.

Respectively Submitted,

Richard S. Brownlee III, Bar #22422 Attorney for Missouri School Boards' Association RSBIII, LLC 121 Madison Street Jefferson City, MO 65101 (573) 616-1911 rbrownlee@rsblobby.com

## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties on the official service list for this case on this  $23^{rd}$  day of October, 2014.

Richard S. Bromabe 5

Richard S. Brownlee III, Attorney