

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

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  
 )  
 )

**MSBA’S DATA REQUEST TO SNG**

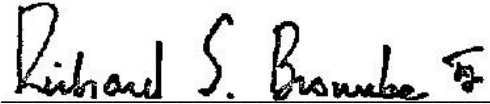
Comes now Missouri School Boards’ Association (“MSBA”), in accordance with Commission Rule 4 CSR 240-2.090(2) and submits the following data request to Summit Natural Gas of Missouri, Inc. (“SNGMO”):

**DATA REQUEST**

1. Reference rebuttal testimony of Tyson Porter, page 6, starting at line 15, where SNGMO’s witness Porter states that “...neither Staff nor Summit has included the schools’ (sic) billing determinates in the applicable retail sales customer classes in its direct case” but goes on to say that “Summit has performed the analysis and shows the inclusion of the meters in the applicable retail sales customers classes in Rebuttal Schedule TDP-3”. Regarding this statement:
  - a. Has SNGMO’s analysis produced a new CCOS? If so, please provide a fully operative copy with an explanation of all assumptions and allocators listed and explained.
  - b. Has SNGMO also included the schools’ volumes in the retail sales class?
  - c. Has SNGMO’s analysis produced a new table of rate schedules? If so, please provide a copy showing rates with and without schools in the transportation class under equal assumptions and allocators.

- d. Provide the legal basis and precedents relied on by SNGMO to allow a complete change in placement of a sub-class of customer within a different rate class without withdrawing the current case and refiling a new case with adequate due process and timeline.

Respectively submitted,



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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 15th day of July, 2014, to:

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Richard S. Brownlee III

## Missouri School Board Association

### Data Request

<b>Data Request No.</b>	42
<b>Company Name</b>	Summit Natural Gas of Missouri, Inc.
<b>Case/Tracking No.</b>	GR-2014-0086
<b>Date Requested</b>	7/15/2014
<b>Requested From</b>	Dean Cooper/Summit Natural Gas of Missouri, Inc. (the "Company")
<b>Requested By</b>	Richard S. Brownlee III, Louie Ervin/Missouri School Board's Association ("MSBA")
<b>Description</b>	Please see attached.
<b>Due Date</b>	7/22/2014
<b>Security</b>	<b>Public</b>

#### **RESPONSE:**

- A) No
- B) No
- C) No
- D) SNGMO is unaware of any legal basis or precedent that would suggest a requirement that a rate case should be withdrawn and refiled as a result of a change in a party's class cost of service study, or any requirement for specific "due process or timeline" associated with a utility's class cost of service study. Statutory notice is provided by a utility's filing of tariffs/schedules (Section 393.150). Due process and timelines for consideration of those tariffs/schedules are established by the Commission within the parameters of its statutes. SNGMO proposed rates for the schools in its filed tariffs/schedules. Ultimately, the Commission will determine what rate it believes to be just and reasonable. The Commission may rely on, or not rely on, the evidence presented to it and assign such weight to that evidence as it believes appropriate. This includes whatever weight the Commission may give to SNGMO's study.

Response Provided by: Tyson Porter