

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

In the Matter of a Working Case to Consider a)	
Proposed Residential Customer Disconnection)	File No. AW-2020-0148
Data Reporting Rule)	

SUMMIT’S INITIAL COMMENTS

Summit Natural Gas of Missouri, Inc. (“Summit”) submits its comments in consideration of the Office of the Public Counsel’s (“OPC”) proposed Residential Customer Disconnection Data Reporting Rule.

Summit notes several areas of the draft rule, as offered by the OPC, that should be clarified. For example, in Section 2(D), the proposed rule requires a utility to report “the total number of unique residential accounts that were voluntarily disconnected at least once during the month.” In section 1(M) of the definitions, a voluntary disconnection is defined as the “cessation of regulated utility services...that is undertaken at the request of the customer receiving service.” Summit requests additional clarification as to whether this would apply where there is a changeover in account holders (for example, one tenant moving out of a rental property and another moving in, with the new tenant taking control of the account).

Summit also suggests a revision to the language in section 2(M), which requires that a utility report “the total number of delinquent charges that were transferred to...any third-party collection agency...”. A single customer’s bill could include between 5 and 10 unique charges. Summit suggests that this section be revised to require a utility to report the number of unique accounts that were sent to a collection agency and/or the total dollar

amount of charges sent to a collection agency. Summit believes this information is more indicative of the overall collection efforts of the utility. Lastly, Summit requests additional clarity as to whether gas emergency shut offs would qualify as involuntary disconnections as defined in section 1(H).

Summit notes that a portion of the data sought under the proposed rule is not currently captured by its data collection systems. Two of the proposed reporting requirements, sections 2(R) and 2(S) (dollars received from persons that were not the customer on the subject account), would require additional expenditures to build and deploy the reporting tools necessary to gather the data required. Tracking these two data points would require implementation of new third-party payment types, creating entirely new processes, and would require individuals making payments on behalf of customers to self-identify as not being an account holder. As these individuals would need to self-identify for Summit to be able to determine whether or not they are the account holder, Summit does not believe the information would accurately indicate the frequency of third-party payors. With the accuracy of the information in question and considering the difficulty of implementing the tracking processes, Summit does not believe that tracking this data is cost effective. Summit suggests that sections 2(R) and 2(S) be removed from the proposed rule.

Summit appreciates the opportunity to submit comments to the Commission regarding the proposed Residential Customer Disconnection Data Reporting Rule. Summit will likely offer additional comments once it has an opportunity to review the responsive comments of other participants in this process, and will address all comments as allowed in Commission rules and procedures.

Dated this 14th day of February 2020.

Respectfully submitted,

By:

/s/ Brooke South.

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing Initial Comments were served on all parties of record on this 14th day of February 2020 by email.

/s/ Brooke South

Brooke South