

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

In the Matter of the Application of Summit )  
Natural Gas of Missouri, Inc. for a Variance ) File\_No. GE-2018-0193  
from the Provisions of Commission Rule )  
20 CSR 4240-10.030(19) )

**THIRD MOTION FOR VARIANCE**

**COMES NOW** Summit Natural Gas of Missouri, Inc. (“SNGMO” or “the Company”), by and through undersigned counsel hereby submits its *Third Motion for Variance* from the *Order Approving Stipulation and Agreement* relating to the Company’s Meter Sampling Test Program. This Motion is due to continued operational and testing restrictions resulting from the impacts of the COVID-19 pandemic. In support thereof, SNGMO respectfully states as follows to the Missouri Public Service Commission (“Commission”):

1. On September 5, 2018, the Commission issued its *Order Approving Stipulation and Agreement* (“*Order*”), in this case, granting SNGMO’s variance from Commission Rule 20 CSR 4240-10.030(19).<sup>1</sup> Through its *Order*, the Commission approved the Company’s Meter Sampling Test Program (“*Meter Test Program*”), included as Appendix A to the *Non-Unanimous Stipulation and Agreement* filed on August 17, 2018. The *Meter Test Program* is designed to test a sampling of American AC-250 meters over a period of four years, beginning January 2019 and ending December 31, 2022. There are also a number of non-American AC-250 meters that is to be tested under the *Meter Test Program*.

2. On January 1, 2019, SNGMO began testing meters in accordance with its *Meter Test Program*. On March 4, 2020, SNGMO provided Staff and the Office of the Public Counsel a

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<sup>1</sup> At that time, the subject Commission Rule was known as 4 CSR 240-10.030(19).

report on the previous calendar year test results, as required by Section 9 of the Meter Test Program.

3. On September 10, 2020, SNGMO filed a *Motion for Variance* from its Meter Test Program. SNGMO explained in its *Motion for Variance* that COVID-19 had created operational limitations that prevented it from completing the task. As such, SNGMO asked that it be relieved from the obligation set forth in Appendix A, Paragraph (B) to test 211 meters in 2020 and permitted SNGMO to begin its 2021 testing requirement to test 218 American AC-250 meters on January 1, 2021. The Commission issued its *Order Approving Variance* on October 21, 2020, and due to the COVID-19 pandemic found good cause to grant SNGMO's requested variance from its Meter Test Program.

4. On March 10, 2021, SNGMO provided Staff and the Office of the Public Counsel with a report on the previous year test results, as required by Section 9 of the Meter Test Program.

5. On August 5, 2021, SNGMO filed a *Second Motion for Variance* as the impacts from the COVID-19 pandemic continued to create operational limitations, preventing SNGMO from completing its tasks. Specifically, in accordance with State and Federal COVID-19 related health guidance, SNGMO continued to implement restrictions on field activity and customer interaction resulting in an inability to meet the meter test thresholds for 2021. In addition, the Second Motion for Variance, Paragraph 12 indicated a future need to address relief of the target date of completion as described in Paragraph 4(D) of the Non-Unanimous Stipulation and Agreement.

6. The Commission issued its *Order Approving Variance* on September 23, 2021, and due to the COVID-19 pandemic, found good cause to grant SNGMO's requested variance from its Meter Test Program. The Commission relieved SNGMO from the obligation to test 218 meters in

2021, and permitted it to begin the 2022 testing requirement on January 1, 2022.

**Paragraph 4(B) and 4(C)**

7. In Paragraph 4(B) and 4(C), of Appendix A of the Non-Unanimous Stipulation and Agreement, SNGMO agreed to remove and test American AC-250 meters as part of a four-year test program. As outlined in Paragraph 4(B), this test period would begin January 1, 2019, and end on December 31, 2022. While SNGMO continues to make progress toward completing removal and testing of groups<sup>2</sup> and lots<sup>3</sup> of American AC-250 meters, the unprecedented length of COVID-19 pandemic impacts, operational limitations, third party testing facilities restrictions and restricted customer interaction has delayed SNGMO’s ability to complete the proposed meter testing volumes as outlined in Table 1 within the test period.

<b><u>Test Period</u></b>	<b><u>Proposed</u></b>
2019	133 AC-250
2020	211 AC-250
2021	218 AC-250
2022	164 AC-250

Table 1. Meter Test Schedule as identified in Paragraph 4(C) of the Non-Unanimous Stipulation and Agreement.

8. On March 15, 2022, SNGMO provided Staff and the Office of the Public Counsel with a report on the previous year test results, as required by Section 9 of the Meter Test Program

9. Due to the limitations indicated above, SNGMO has effectively now lost nearly three years of its test period. Actual tests during this period have been as follows:

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<sup>2</sup> As described in Appendix A to the Non-Unanimous Stipulation an Agreement, a Lot is defined as “Meters of the Group with the same set year.”

<sup>3</sup> As described in Appendix A to the Non-Unanimous Stipulation an Agreement, a Group is defined as “Meters of a similar manufacturer and model.”

<sup>4</sup> It is understood this number will fluctuate as SNGMO installs new meters and removes old ones.

<b><u>Test Period</u></b>	<b><u>Completed</u></b>
2019	133
2020	38
2021	115
2022	YTD: 21

10. Accordingly, SNGMO requests an extension of its completion date to the American AC-250 meter four-year test program (Paragraph 4(B) and 4(C)) from December 31, 2022 to December 31, 2025. Under this approach, the test program would resume January 1, 2023 and SNGMO proposes a meter sampling schedule as outlined in Table 3.

<b><u>Test Period</u></b>	<b><u>Proposed</u></b>
2023	406 AC-250
2024	508 AC-250
2025	573 AC-250

Table 3. 2023- 2025: Meters Proposed Removed and Tested<sup>4</sup>.

**Paragraph 4(D)**

11. For all of the aforementioned reasons, SNGMO also seeks relief from its removal and testing requirements for the four-year catch-up program of non-American AC-250 meters as outlined in Paragraph 4(D) in the Non-Unanimous Stipulation and Agreement. Despite SNGMO’s continued efforts to remove and test non-American AC-250 meter groups during the pandemic, approximately 4,293 of the original 8,372 proposed meters remain to be tested as part of the four-year catch up program.

12. SNGMO is seeking an extension to its target completion date for the non-American AC-250 meters from December 31, 2022 to December 31, 2025. The program would resume January 1, 2023 and SNGMO proposes the meter removal and testing schedule as outlined in Table 3. SNGMO anticipates that approximately 1,720 additional meters to be added to the to the catch-up program as they will reach 10 years of service within 2023-2025.

<b><u>Test Period</u></b>	<b><u>Proposed</u></b>
2023	1933
2024	1933
2025	1933
<b>Additional</b> <i>(meters that will reach 10 years during 2023-2025)</i>	1,720

Table 3. 2023- 2025 Other Meters Proposed Removed and Tested<sup>4</sup>.

13. Reporting of test results will continue during the test period 2023-2025 as required in Paragraph 9 of Appendix A of the Non-Unanimous Stipulation and Agreement.

### **SUMMARY**

14. Accordingly, SNGMO moves the Commission for a variance from its Meter Test Program as follows: SNGMO requests that it be relieved from the December 31, 2022, target completion dates for its American AC-250 four-year test program and revise this date to extend the completion date to December 31, 2025. SNGMO also requests a variance for its non-American AC-250 four-year catch-up program to reach full compliance with the Missouri Public Service Commission Rule 20 CSR 4240-10.030(19)<sup>5</sup> from December 31, 2022 to December 31, 2025.

<sup>5</sup> Then, it was known as 4 CSR 240-10.030(19).

**WHEREFORE**, SNGMO respectfully moves the Commission to grant it the variances described herein and such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,



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**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 \_\_\_\_ day of November, 2022:

General Counsel's Office  
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