

Exhibit No.:  
Issue: Conversions of Appliances  
Witness: Ronald G. Smith  
Sponsoring Party: Missouri Propane Gas Association  
Type of Exhibit: Supplemental Direct Testimony  
Case No.: GC-2016-0083  
Date Testimony Prepared: May 3, 2017

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

MISSOURI PROPANE GAS ASSOCIATION, )  
 )  
Complainant, )  
 )  
vs. ) File No. GC-2016-0083  
 )  
SUMMIT NATURAL GAS OF MISSOURI, INC., )  
 )  
Respondent. )

**SUPPLEMENTAL DIRECT TESTIMONY OF  
RONALD G. SMITH  
ON BEHALF OF THE  
MISSOURI PROPANE GAS ASSOCIATION  
MAY 3, 2017**

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

**SUPPLEMENTAL DIRECT TESTIMONY OF  
RONALD G. SMITH  
ON BEHALF OF THE  
MISSOURI PROPANE GAS ASSOCIATION**

MAY 3, 2017

**CONTENTS**

	<u>Page</u>
I. Introduction.....	1
II. Purpose and Summary of Testimony.....	1
III. The Four Conversions by SNGMO .....	3
VII. Conclusion .....	7

1 **I. INTRODUCTION**

2 **Q 1: Please state your name, occupation and business address.**

3 A: My name is Ronald G. Smith. I am the Executive Director of Operations for Global  
4 Engineered Solutions Group, LLC, P.O. Box 177, 145 Bandy Ave., Galesburg, IL  
5 61401. My home address is 813 E. 25<sup>th</sup> Ave., New Smyrna Beach, FL 32169.

6 **Q 2: Are you the same Ronald G. Smith that previously filed direct testimony in this**  
7 **case?**

8 A: Yes, I am.

9 **Q 3: On whose behalf are you appearing in this proceeding?**

10 A: I am appearing on behalf of the Missouri Propane Gas Association (“MPGA”).

11 **II. PURPOSE AND SUMMARY OF TESTIMONY**

12 **Q 4: What are the purposes of your supplemental direct testimony in this proceeding?**

13 A: The purposes of my supplemental testimony are to address the four conversions that  
14 are referenced and discussed in SNGMO’s Motion for Summary Determination or  
15 Dismissal and Memorandum in Support.

16 **Q 5: What filings or documents have you reviewed to assist in preparing your testimony?**

17 A: I have reviewed several filings and documents. From Case No. GR-2014-0086, I  
18 reviewed the *Partial Stipulation and Agreement As To Dual Fuel and Conversion of*  
19 *Appliances* (the Agreement) between MPGA and SNGMO. From Case No. GC-2014-  
20 0083, I reviewed MPGA’s First Amended Complaint; SNGMO’s Answer to the First  
21 Amended Complaint; MPGA’s Motion for Partial Summary Disposition (including  
22 MPGA witness Brian Brooks’ Affidavit and Exhibits) and Memorandum in Support;  
23 SNGMO’s Response to MPGA’s Motion for Partial Summary Determination

1 (including SNGMO witness David Meyer's Affidavit) and Memorandum in Support;  
2 the Commission's November 9, 2016 Order Denying Motion for Partial Summary  
3 Disposition; SNGMO's Motion for Summary Determination or Dismissal  
4 ("SNGMO's Motion"); and SNGMO's Memorandum in Support.

5 **Q 6: Based on what you have reviewed, what is your understanding of what this case is**  
6 **about?**

7 A: My understanding is that the basic facts of the case are not in dispute. In the  
8 documents that I have reviewed, SNGMO freely admits that it has converted and is  
9 continuing to convert vent-free, or unvented, gas heating products, and admits to  
10 converting the four units referenced and discussed by SNGMO in SNGMO's Motion.  
11 In its November 9 Order, at page 2 the Commission recognized that "Summit  
12 acknowledges that it converted four gas-heating products from propane to natural gas,  
13 but disagrees with MPGA's framing of the issue." The only issue left in dispute is  
14 whether SNGMO has violated the Agreement approved by the Commission on  
15 September 3, 2014 in Case No. GR-2014-0083.

16 **III. THE FOUR CONVERSIONS BY SNGMO**

17 **Q 7: Are you aware of the four conversions cited and discussed in SNGMO's Motion?**

18 A: Yes, I am. These are the same four conversions to the four unvented heating products  
19 that come from the MPGA Motion for Partial Summary Determination, which was  
20 supported by an affidavit and exhibits of Brian Brooks.

21 **Schedule RGS-4** to my previously-filed direct testimony is SNGMO's response to  
22 Data Request No. 4 of MPGA's First Set of Data Requests, which asked "Please  
23 provide a list of all vent-free appliances, including date of conversion, type of  
24 appliance, name of manufacturer, model and serial number for each such appliance

1 converted by SNGMO in the past 5 years.” In response, SNGMO provided a  
2 spreadsheet (“spreadsheet”) showing that it had converted 109 vent-free appliances.  
3 The spreadsheet shows that between September 29, 2014 and September 4, 2015  
4 (after the Agreement between MPGA and SNGMO was approved in Case No. GR-  
5 2014-0083), SNGMO converted the four vent-free heating products at issue. I have  
6 reviewed the Brooks affidavit and exhibits. The exhibits include service orders and  
7 owners’ manuals for the converted units and a copy of the rating plate for one of the  
8 units. After review, the affidavit and exhibits are true and accurate to the best of my  
9 knowledge, and I adopt and endorse the affidavit and supporting exhibits of Brian  
10 Brooks, attached to this testimony as **Schedule RGS-5**.

11 **Q 8: What are those four conversions?**

12 A: As listed in Paragraph 4 of SNGMO’s Motion, they are as follows.

13 “Fireplace 1” is a “fireplace manufactured by DESA, model number VGF28PT”. This  
14 unit is Item No. 56 on the spreadsheet provided by SNGMO, **Schedule RGS-4**.

15 “Fireplace 2” is “a fireplace manufactured by Sure Heat, model number BIVFMV[.]”  
16 In the spreadsheet provided by SNGMO, this unit is Item No. 37 on the spreadsheet  
17 provided by SNGMO, **Schedule RGS-4**.

18 “Fireplace 3” is a unit converted in front of several witnesses, including a MO PSC  
19 employee and MPGA’s Brian Brooks, at SNGMO’s office in Sunrise Beach, MO, on  
20 March 19, 2015. SNGMO did not include this conversion in its Spreadsheet  
21 (**Schedule RGS-4**), but did provide a copy the rating plate attached to the unit in  
22 response to a MPGA data request. The rating plate shows that this is a fireplace

1 manufactured by SHM International Corp. The copy of the rating plate is attached to  
2 my direct testimony as **Schedule RGS-3**.

3 “Fireplace 4” is a “fireplace manufactured by DESA, model number  
4 VMH26PRB/EFS26PRA”. This unit is Item No. 15 on the spreadsheet provided by  
5 SNGMO, **Schedule RGS-4**.

6 *A. Fireplace 1*

7 **Q 9: What are the details surrounding the conversion of Fireplace 1?**

8 A: On March 19, 2015, SNGMO converted an unvented heating product from propane  
9 to natural gas that was manufactured by DESA, model no. VGF28PT. A copy  
10 SNGMO’s General Service Order and DESA’s Owner’s Manual pertaining to this  
11 product is found at pages 46-87 of **Schedule RGS-5**.

12 **Q 10: Did SNGMO follow the manufacturers’ specifications for Fireplace 1?**

13 A: No. SNGMO ignored the warnings and specifications listed in Fireplace 1’s owners’  
14 manual. Specifically, SNGMO violated the following:

- 15 a. On page 3 of the Owner’s Manual, it states: “1. Use only propane gas. Do not  
16 convert fireplace to use different fuel type.” **Schedule RGS-5**, page 50.
- 17 b. On page 31 of the Owner’s Manual, under the “**Specifications**” section, it states:  
18 “Type of Gas Propane Gas Only.” **Schedule RGS-5**, page 78.

19 *B. Fireplace 2*

20 **Q 11: What are the details surrounding the conversion of Fireplace 2?**

21 A: On September 4, 2015, SNGMO converted an unvented gas heating product from  
22 propane to natural gas that was manufactured by Sure Heat, model no. BIVFMV. A

1 copy of SNGMO's General Service Order and Sure Heat's Owner's Manual  
2 pertaining to this product is found at pages 118-134 of **Schedule RGS-5**.

3 **Q 12: Did SNGMO follow the manufacturers' specifications for Fireplace 2?**

4 A: No. SNGMO ignored the specifications listed in Fireplace 2's owners' manual.

5 Specifically, SNGMO violated:

6 a. On page 1 of the Owner's manual, it states: "NOTE: THIS UNIT CANNOT BE  
7 CONVERTED TO DIFFERENT GAS TYPE." Schedule RGS-5, page 119.

8 b. On page 1 of the Owner's Manual, it states: "THIS APPLIANCE IS ONLY FOR  
9 USE WITH THE TYPE OF GAS INDICATED ON THE RATING PLATE.  
10 THIS APPLIANCE IS NOT CONVERTIBLE FOR USE WITH OTHER  
11 GASES." Schedule RGS-5, page 119.

12 *C. Fireplace 3*

13 **Q 13: What are the details surrounding the conversion of Fireplace 3?**

14 A: On March 19, 2015, at its office in Sunrise Beach, MO, SNGMO converted an  
15 unvented heating product from propane to natural gas that was manufactured by SHM  
16 International Corp. The rating plate applies to multiple models: (S, B) VFMV  
17 (21,24,27,30) LP. A copy of the rating plate attached to the product that was supplied  
18 by SNGMO in response to a MPGA data request and a copy of the SHM Owner's  
19 Manual pertaining to the product is contained in pages 91-117 of **Schedule RGS-5**.

20 **Q 14: Did SNGMO follow the manufacturers' specifications for Fireplace 3?**

21 A: No. SNGMO ignored the specifications listed in Fireplace 3's rating plate and  
22 owners' manual. Specifically, SNGMO violated:

1 a. The rating plate attached by the manufacturer to the product says the following:

2 i. "Gas Type Propane/LP"

3 ii. "This appliance is only for use with propane gas. This appliance shall not  
4 be field converted."

5 iii. "This appliance is only for use with the type of gas indicated on the rating  
6 plate."

7 iv. "This appliance is not convertible for use with other gases."

8 b. The Owner's Manual is consistent with the language in on the rating plate and  
9 contains the following language:

10 i. Page 1: "This appliance is only for use with the type of gas on the rating  
11 plate. This appliance is not convertible for use with other gases."

12 ii. Page 3: "1. This appliance is only for use with the type of gas on the  
13 rating plate. This appliance is not convertible for use with other gases."

14 iii. Page 25: Under the "**Specifications**" section for model VFM 21,24 LP  
15 and VFM 27,30 LP, it states: "Gas Type Propane/LP"

16 *D. Fireplace 4*

17 **Q 15: What are the details surrounding the conversion of Fireplace 4?**

18 A: On September 29, 2014, SNGMO converted an unvented heating product from  
19 propane to natural gas that was manufactured by DESA, model no.

20 VMH26PRB/EFS26PRA. A copy of SNGMO's General Service Order and DESA's  
21 Owner's Manual pertaining to this product is found at pages 5-45 of Schedule RGS-5.



1 **Q 16: Did SNGMO follow the manufacturers' specifications For Fireplace 4?**

2 A: No. SNGMO ignored the specifications listed in Fireplace 4's owners' manual.

3 Specifically, SNGMO violated the following:

4 a. On page 2 of the Owner's Manual, it states: "This appliance is only for use with  
5 the type of gas on the rating plate. This appliance is not convertible for use with  
6 other gases." **Schedule RGS-5**, page 7.

7 b. On page 4 of the Owner's Manual, it states: "1. This appliance is only for use with  
8 the type of gas on the rating plate. This appliance is not convertible for use with  
9 other gases." **Schedule RGS-5**, page 9.

10 c. On page 32 of the Owner's Manual, under the "**Specifications**" section for model  
11 no. VMH26PRB/EFS26PRB it states:

12 "Type of Gas Propane /LP gas only." **Schedule RGS-5**, page 37.

13 **IV. CONCLUSION**

14 **Q 17: Does this complete your testimony?**

15 A: Yes it does.

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

MISSOURI PROPANE GAS ASSOCIATION, )  
Complainant, )  
VS ) File No. GC-2016-0083  
SUMMIT NATURAL GAS OF MISSOURI, INC., )  
Respondent. )

AFFIDAVIT OF RONALD G. SMITH

STATE OF MISSOURI )  
COUNTY OF RANDOLPH ) ss

Ronald G. Smith, being first duly sworn on his oath, states:

1. My name is Ronald G. Smith. I am the Executive Director of Operations for Global Engineered Solutions Group, LLC. My business address is P.O. Box 177, 145 Bandy Ave., Galesburg, IL 61401.
2. Attached hereto and made a part hereof for all purposes is my Supplemental Direct Testimony on behalf of the Missouri Propane Gas Association, consisting of 7 pages, all of which have been prepared in written form for introduction into evidence in the above-referenced docket.
3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct.

Ronald G. Smith  
Ronald G. Smith

Subscribed and sworn to before me this 3<sup>rd</sup> day of may, 2017.

Betty J. Hampton  
Notary Public

My commission expires: 09/01/18

BETTY J. HAMPTON  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for Randolph County  
My Commission Expires September 01, 2018  
Commission Number: 14629803