

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

In the Matter of Staff's Review of Commission )  
Rules 4 CSR 240-20.060 (Cogeneration) )  
4 CSR 240-3.155 (Filing Requirements for ) File No. EW-2018-0078  
Electric Utility Cogeneration Tariff Filings) and )  
4 CSR 240-20.065 (Net Metering) )

**COMMENTS OF SNGMO**

**COMES NOW** Summit Natural Gas of Missouri, Inc. ("SNGMO" or the "Company"), and, as its comments, states as follows to the Missouri Public Service Commission ("Commission"):

1. SNGMO is a wholly owned subsidiary of Summit Utilities, Inc., and is a corporation duly incorporated under the laws of the State of Colorado with its principal offices located at 7810 Shaffer Parkway, Suite 120, Littleton, Colorado, 80127. SNGMO conducts business as a "gas corporation" and a "public utility" as those terms are defined in RSMo. §386.020, and provides natural gas service in the Missouri counties of Harrison, Daviess, Caldwell, Pettis, Benton, Morgan, Camden, Miller, Greene, Webster, Laclede, Wright, Douglas, Texas, Howell, Lawrence, Barry, Stone, and Taney, subject to the jurisdiction of the Commission as provided by law.

2. All correspondence, communications, notices, orders and decisions of the Commission with respect to this matter should be sent to the undersigned counsel and:

Matthew Kaply  
Sr. Director Legislative and Regulatory Affairs  
Summit Utilities Inc.  
7810 Shaffer Pkwy., Ste. 120  
Littleton, CO 80127  
Telephone: 207-621-8000 ex. 430  
Email: [mkaply@summitnaturalgas.com](mailto:mkaply@summitnaturalgas.com)

3. On September 27, 2017, the Commission issued its *Order Opening a Working Case to Review the Commission's Rules Related to Cogeneration*. The Order invited interested parties to submit comments.

4. SNGMO has an interest in the review of Rule 4 CSR 240-20.060 on Cogeneration and its impact on Combined Heat and Power (CHP) generation. It is SNGMO's position that CHP systems can increase the overall efficiency of an energy system by generating electricity, while capturing useful heat simultaneously. CHP provides significant energy savings and cost savings for customers while also decreasing carbon emissions. SNGMO would like to see the option of CHP continue for our customers and the people of Missouri. SNGMO seeks this opportunity to make sure that any change to this rule does not negatively impact CHP opportunities for our customers and the people of Missouri.

5. SNGMO appreciates the opportunity to provide comments in this working case and looks forward to participating as this matter moves forward.

**WHEREFORE**, SNGMO respectfully requests the Commission consider its comments.

Respectfully submitted,

/s/ Hannah Ahrendt

Hannah Ahrendt  
Regulatory Specialist II  
Summit Utilities, Inc.  
7810 Shaffer Pkwy., Ste. 120  
Littleton, CO 80127  
720-981-2123 ex. 1173  
[hahrendt@summitutilitiesinc.com](mailto:hahrendt@summitutilitiesinc.com)

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been sent by electronic mail this 16<sup>th</sup> day of October, 2017, to the Office of the General Counsel and the Office of the Public Counsel.

/s/ Hannah Ahrendt  
Hannah Ahrendt