

**BEFORE THE 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  
Tracking No. YG-2014-0285

**POST-HEARING REPLY BRIEF**  
**OF THE MISSOURI PROPANE GAS ASSOCIATION**

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I. **SUMMIT NATURAL GAS OF MISSOURI'S (SNGMO) PROPOSED CONVERSION PROGRAM**

This Reply Brief will address one issue: SNGMO's proposal to end its free conversion program and replace it with a program where the customer pays the actual conversion costs. The Missouri Propane Gas Association (MPGA) supports SNGMO's proposal.

SNGMO's proposal was stated in its Initial Brief at page 35:

The Commission should approve SNGMO's conversion program as proposed by the Company. The evidence supports SNGMO's request to continue providing its in-home conversion service, but with the actual cost of each conversion being paid by the customer receiving the service. The Company currently has a tariff which provides for free conversion in certain circumstances. SNGMO's proposed tariff continues the service offering, but requires the customer to pay the actual cost of the service in all circumstances. (Exh. 18, Wankum Dir., p. 14; Exh. 20, Wankum Sur., p. 8-9) Additionally, when converting appliances from propane to natural gas, SNGMO shall follow all applicable national and local codes and manufacturers' specifications relating to the conversion of appliances. *See Partial Stipulation and Agreement as to Dual Fuel and Conversion of Appliances*, para. 1.

As MPGA stated in its initial Post-Hearing Brief, all the propane dealers are asking for from this Commission is a chance to fairly compete on a level playing field. Since so much of the competition is based on price, the propane dealers would like the Commission to set rates based on the true cost of service to the extent possible so that the market will operate fairly, and customers will be free to choose what fuel is best for them based on actual costs.

Requiring customers to pay the actual costs of providing in-home conversion services as proposed by SNGMO is consistent with MPGA's position, and is consistent with a fair competitive market that benefits consumers by giving them all the accurate pricing information they need to make appropriate choices in who they want to serve them.

## II. CONCLUSION

MPGA agrees that the evidence supports SNGMO's request to continue providing its in-home conversion service, but with the actual cost of each conversion being paid by the customer receiving the service.

WHEREFORE, MPGA respectfully offers this Post-hearing Brief and prays that the Commission conform its decision in this case to the arguments contained herein.

Respectfully submitted,

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## CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties on the official service list for this case on this 26<sup>th</sup> day of September, 2014.



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Terry M. Jarrett