

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

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| In the Matter of the Application of Summit Natural |) | |
| Gas of Missouri, Inc. for a Temporary Variance from |) | |
| Rule and Tariff Provisions Relating to Late Payment |) | File No. GE-2020-_____ |
| Fees and Service Disconnections and Motion for |) | |
| Expedited Treatment |) | |

**SUMMIT NATURAL GAS OF MISSOURI, INC.’S APPLICATION FOR A
TEMPORARY VARIANCE FROM RULE AND TARIFF PROVISIONS RELATING TO
LATE PAYMENT FEES AND DISCONNECTION RULES AND MOTION FOR
EXPEDITED TREATMENT**

COMES NOW Summit Natural Gas of Missouri, Inc. (“SNGMO” or “the Company”), pursuant to Commission Rules 20 CSR 4240-2.060(4), 20 CSR 4240-2.205 and 20 CSR 4240 13.065, files this Application for a Temporary Variance from Rule and Tariff Provisions relating to late payment fees and service disconnections and Motion for Expedited Treatment which helps the Company’s proposal to suspend meter disconnections and waive late payment fees for customers during the COVID-19 pandemic. In support thereof, SNGMO respectfully states as follows to the Missouri Public Service Commission (“Commission”):

APPLICANT

1. The Company is a wholly owned subsidiary of Summit LDC Holdings, LLC, which is a wholly-owned subsidiary of Summit Utilities, Inc. The Company is a corporation duly incorporated under the laws of the State of Colorado, with its principal offices located at 10825 E. Geddes Avenue, Suite 410, Centennial, CO 80112.

2. The Company conducts business as a “gas corporation” and a “public utility” as those terms are defined at §386.020, RSMo, and provides natural gas service in the Missouri counties of Benton, Caldwell, Camden, Daviess, Douglas, Greene, Harrison, Howell, Laclede,

Miller, Morgan, Pettis, Stone, Taney, Texas, Webster, and Wright, subject to the jurisdiction of the Commission as provided by law. Other than cases that have been docketed at the Commission, SNGMO has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court within the past three years that involve customer service or rates. SNGMO has no annual report or assessment fees that are overdue.

3. 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 Regulatory Affairs and Rates
Summit Utilities, Inc.
2 DeLorme Drive, Suite 100
Yarmouth, ME 04096
Telephone: 207-621-8000, ex. 1430
Email: mkaply@summitnaturalgas.com

James Lydon
Regulatory Affairs Specialist
Summit Utilities, Inc.
2 DeLorme Drive, Suite 100
Yarmouth, ME 04096
Telephone: 207-781-1200, ex. 1740
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APPLICATION FOR VARIANCE

4. COVID-19 has created financial hardships for an increasing number of SNGMO customers including layoffs, medical bills, and decreased wages. Customers are also being asked to stay at home to help prevent the spread of the virus. As part of SNGMO's effort to provide safe and reliable service to its customers who are impacted by this pandemic, SNGMO is seeking a waiver to discontinue any disconnection activities and any late payment fee assessments.

5. Specifically, SNGMO is seeking relief from the following tariff provisions:

- Sheet No. 8 Gallatin Division, General Service
 - Late Payment Charge – Unless otherwise required by law or other regulation 1.5%, will be added to the outstanding balance of all bills not paid by the delinquent date stated on the bill.

- Sheet No. 9 Warsaw Division, General Service
 - Late Payment Charge – Unless otherwise required by law or other regulation 1.5%, will be added to the outstanding balance of all bills not paid by the delinquent date stated on the bill.
- Sheet No. 10 Lake of the Ozarks Division, General Service
 - Late Payment Charge – Unless otherwise required by law or other regulation 1.5%, will be added to the outstanding balance of all bills not paid by the delinquent date stated on the bill.
- Sheet No. 11 Rogersville Division, General Service
 - Late Payment Charge – Unless otherwise required by law or other regulation 1.5%, will be added to the outstanding balance of all bills not paid by the delinquent date stated on the bill.
- Sheet No. 12 Branson Division, General Service
 - Late Payment Charge – Unless otherwise required by law or other regulation 1.5%, will be added to the outstanding balance of all bills not paid by the delinquent date stated on the bill.
- Sheet No. 15A Gallatin Division, Commercial Service
 - Late Payment Charge – Unless otherwise required by law or other regulation 1.5%, will be added to the outstanding balance of all bills not paid by the delinquent date stated on the bill.
- Sheet No. 16A Warsaw Division, Commercial Service
 - Late Payment Charge – Unless otherwise required by law or other regulation 1.5%, will be added to the outstanding balance of all bills not paid by the delinquent date stated on the bill.
- Sheet No. 17A Lake of the Ozarks Division, Commercial Service
 - Late Payment Charge – Unless otherwise required by law or other regulation 1.5%, will be added to the outstanding balance of all bills not paid by the delinquent date stated on the bill.
- Sheet No. 18 Rogersville Division, Large General Service
 - Late Payment Charge – Unless otherwise required by law or other regulation 1.5%, will be added to the outstanding balance of all bills not paid by the

delinquent date stated on the bill.

- Sheet No. 19 Branson Division, Large General Service
 - Late Payment Charge – Unless otherwise required by law or other regulation 1.5%, will be added to the outstanding balance of all bills not paid by the delinquent date stated on the bill.
- Sheet No. 20A Gallatin Division, Large Volume Service
 - Late Payment Charge – Unless otherwise required by law or other regulation 1.5%, will be added to the outstanding balance of all bills not paid by the delinquent date stated on the bill.
- Sheet No. 21A Warsaw Division, Large Volume Service
 - Late Payment Charge – Unless otherwise required by law or other regulation 1.5%, will be added to the outstanding balance of all bills not paid by the delinquent date stated on the bill.
- Sheet No. 22A Lake of the Ozarks, Large Volume Service
 - Late Payment Charge – Unless otherwise required by law or other regulation 1.5%, will be added to the outstanding balance of all bills not paid by the delinquent date stated on the bill.
- Sheet No. 23A Rogersville Division, Large Volume Service
 - Late Payment Charge – Unless otherwise required by law or other regulation 1.5%, will be added to the outstanding balance of all bills not paid by the delinquent date stated on the bill.
- Sheet No. 24A Branson Division, Large Volume Service
 - Late Payment Charge – Unless otherwise required by law or other regulation 1.5%, will be added to the outstanding balance of all bills not paid by the delinquent date stated on the bill.
- Sheet No. 49 Within SNG-MO Certificated Service Areas, Experimental Missouri School Program + Transportation Service Rate Schedule
 - The Company shall add to any delinquent unpaid bill a sum equal to one and one half percent (1-1/2%) of the outstanding balance.
- Sheet No. 73 (13) Discontinuance of Service
 - The Company may discontinue its service to the customer for any one of the

following reasons...Nonpayment of an undisputed delinquent account

6. Additionally, SNGMO seeks a waiver from the Commission Rules which may be construed to limit SNGMO's ability to waive disconnection practices and late payment fees¹.

7. SNGMO seeks these waivers indefinitely until it has determined that the impact of COVID-19 is no longer detrimental in accordance with section 8 below.

8. SNGMO will carefully monitor the spread and impact of the pandemic to determine when normal practices as set forth in its tariff can resume. Upon determining that business has returned to normal or near normal conditions, SNGMO will provide at least 15 days' notice to affected customers before reinstating late fees and disconnection activities.

9. Due to the speed at which the pandemic is spreading and the need to implement these practices in a timely manner, SNGMO submits that there is good cause shown to approve this filing on an expedited basis. Expediting the approval of this filing will avoid further harm to customers and does not negatively impact customers or the public.

WHEREFORE, SNGMO requests, for good cause shown, that the Commission approve the requested temporary variances in an expedited manner. SNGMO requests such other further relief as is just and proper under the circumstances.

Dated this 23rd day of March 2020.

Respectfully submitted,

By:

/s/ Brooke South

Brooke South MO Bar #: 66624

Corporate Counsel

Summit Natural Gas of Missouri, Inc.

116 Chiefs Court

Branson, MO 65616-4089

479-783-3181, ex. 2229

bsouth@summitutilities.com

ATTORNEY FOR SUMMIT NATURAL
GAS OF MISSOURI, INC.

¹ See 20 CSR 4240-13.050, 20 CSR 4240-13.055, and 20 CSR 4240 13.065

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 23rd day of March, 2020:

General Counsel's Office

staffcounsel@psc.mo.gov

Office of the Public Counsel

opc@ded.mo.gov

By:

/s/ Brooke South

Brooke South