BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of the Missouri	
Association of Natural Gas Operators, Inc. for	
a Permanent Waiver From the Provisions of	Case No. GE-2022-0214
20 CSR 4240-40.020(2)(D)1B for Estimated	
Property Damage Threshold for a Federal Incident,)	
and 20 CSR 4240-40.020(7)(B) Distribution System)	
Mechanical Fitting Failure Reports.)

SUPPLEMENT TO APPLICATION

COMES NOW the Missouri Association of Natural Gas Operators, Inc. ("MANGO" or "Applicant"), on behalf of its members, and in response to a request from Staff to identify those members primarily interested in seeking waivers from the provisions of 20 CSR 4240-40.020(2)(D)1B and 20 CSR 4240-40.020(7)(B), and respectfully states the following to the Commission as a Supplement to its Application filed on February 7, 2022:

1. Those members of MANGO primarily interested in the relief sought by the Application are as follows:

City Utilities of Springfield, Missouri ("City Utilities")

City of Potosi, Missouri

City of Paris, Missouri

Summit Natural Gas of Missouri ("SNGMO")

Liberty Utilities Co. d/b/a/ The Empire District Gas Company / Liberty Utilities (Midstates Natural Gas) Corp. ("Liberty")

Union Electric Company d/b/a/ Ameren Missouri ("Ameren")

Spire Missouri, Inc. d/b/a Spire Missouri East and Spire Missouri West ("Spire")

- 2. Each of the above-listed members operates a natural gas distribution system in Missouri, either as an Investor Owned or Municipal Utility Natural Gas Operator. Each of the above-listed members, in some fashion, are subject to the regulation of the Commission.
- 3. City Utilities is a municipal owned utility that provides natural gas services to the City of Springfield and surrounding areas in Greene and Christian Counties. City Utilities is

overseen by a governing board composed of citizens residing within and around its service area.

- 4. The City of Potosi, Missouri is a municipality of the 4th class located in Washington County. The City of Potosi provides natural gas service to its residents. According to the 2020 Census, there are 2,538 residents in Potosi¹.
- 5. The City of Paris, Missouri is a municipality of the 4th class located in Monroe County. The City of Paris provides natural gas service to its residents. According to the 2020 Census, there are 1,161 residents in Paris².
- 6. SNGMO is an indirect, wholly owned subsidiary of Summit Utilities, Inc., through an intermediate holding company, Summit LDC Holdings, LLC, and is a corporation duly incorporated under the laws of the State of Colorado. SNGMO conducts business as a "gas corporation" and a "public utility" as those terms are defined in Section 386.020, RSMo, and provides natural gas service in the Missouri counties of Harrison, Davies, 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.
- 7. Liberty Utilities (Midstates Natural Gas) Corp. and The Empire District Gas Company are Missouri corporations. Liberty and The Empire District Gas Company each conduct business as a "gas corporation" and a "public utility" as those terms are defined in Section 386.020, RSMo.
- 8. Ameren is a wholly-owned subsidiary of Union Electric Company and conducts business as a "gas corporation" and a "public utility" as those terms are defined in Section 386.020, RSMo. Ameren supplies natural gas service to more than 90 communities in Missouri.
 - 9. Spire Missouri East and Spire Missouri West are the operating units of Spire

¹ According to the Official Manual State of Missouri 2021-2022, pgs. 846-847.

 $^{^{2}}$ Id.

Missouri, Inc. Spire Missouri, Inc. is in turn a wholly-owned by Spire, Inc. Spire Missouri, Inc. is a "gas corporation" and a "public utility" as those terms are defined in Section 386.020, RSMo. Spire East serves residential, commercial, and industrial customers in the City of St. Louis and parts of ten counties in eastern Missouri. Spire West generally operates in 20 western Missouri counties including the cities of Kansas City, St. Joseph, Warrensburg, and Joplin.

WHEREFORE, the Applicant requests that the Commission accept and consider the supplemental information contained herein.

Respectfully submitted,

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ATTORNEYS FOR APPLICANT

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail to the following this 22nd day of February, 2022:

Office of the General Counsel staffcounselservice@psc.mo.gov

Office of the Public Counsel opcservice@opc.mo.gov