

Exhibit No.: \_\_\_\_\_  
Issue: Safety  
Witness: David Moody  
Exhibit Type: Surrebuttal  
Sponsoring Party: Summit Natural Gas of Missouri, Inc.  
Case No.: GR-2014-0086  
Date: August 8, 2014

**MISSOURI PUBLIC SERVICE COMMISSION**

**CASE NO. GR-2014-0086**

**SURREBUTTAL TESTIMONY**

**OF**

**DAVID MOODY**

**ON BEHALF OF**

**SUMMIT NATURAL GAS OF MISSOURI, INC.**

**Jefferson City, Missouri**

**August, 2014**

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**SURREBUTTAL TESTIMONY**

**DAVID MOODY**

**SUMMIT NATURAL GAS OF MISSOURI, INC.**

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. David Moody, 215 Gage Dr, Suite G, Hollister, MO 65672.

3 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

4 A. I am employed by Summit Natural Gas of Missouri, Inc. (SNG) as its President.

5 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY AND SCHEDULES IN**  
6 **THIS CASE?**

7 A. No.

8 **Q. PLEASE STATE YOUR EDUCATIONAL BACKGROUND AND YOUR**  
9 **RELEVANT BUSINESS EXPERIENCE.**

10 A. Please see Schedule DM-1.

11 **Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?**

12 A. The purpose of my surrebuttal testimony is to respond to the rebuttal testimony of  
13 Missouri Propane Gas Association (MPGA) Witness Brian Brooks, as it relates to  
14 safety issues.

15 **RESPONSE TO MPGA WITNESS BROOKS' TESTIMONY**

16 **Q. IN HIS REBUTTAL TESTIMONY ON PAGE 4, LINES 15-22, AND PAGE 5,**  
17 **LINES 1-5, MPGA WITNESS BROOKS DESCRIBES A CONVERSION ISSUE**  
18 **WHERE HE ALLEGES THAT SNG REPRESENTATIVES IMPROPERLY**

1           **CONVERTED A VENT FREE APPLIANCE.     MR. BROOKS FURTHER**  
2           **ALLEGES THAT HE HAD A BRIEF INFORMAL CONVERSATION “WITH THE**  
3           **PRESIDENT OF SNG, DAVID MOODY” REGARDING THIS ISSUE AND THAT**  
4           **MR. MOODY TOLD HIM THAT SNG “USED PROPER PILOTS, ORIFICES AND**  
5           **FOLLOWED MANUFACTURE GUIDELNES.” ARE YOU THE DAVE MOODY**  
6           **TO WHICH MR. BROOKS REFERS?**

7    A.    I assume that I am.

8    **Q.    DO YOU AGREE THAT SNG USES PROPER PILOTS, ORIFICES AND**  
9           **FOLLOWED MANUFACTURE GUIDELNES IN CONVERSION ACTIVITIES?**

10   A.    I do. Additionally, I have included the latest order of 150 natural gas pilot oxygen  
11           depletion sensors (ODS), see Surrebuttal Schedule DM-2. SNG has been ordering  
12           and installing proper conversion parts on all conversions. Mr. Brooks presents in  
13           exhibit 4 a document from AO Smith Water Products Company, that the practice of  
14           converting their water heating products from propane to natural gas is acceptable.

15   **Q.    MR. BROOKS REFERENCES FACTS CONTAINED IN AN “EXHIBIT 3”**  
16           **ATTACHED TO HIS TESTIMONY AS THE BASIS FOR HIS ALLEGATIONS.**  
17           **ARE YOU ABLE TO ADDRESS THAT SPECIFIC SITUATION?**

18   A.    I am not. The name and address of the person associated with those allegations  
19           has been labeled “Highly Confidential” by the MPGA. Therefore, I am not allowed  
20           to review that information and I cannot confirm exactly what actions were, or were  
21           not, taken by SNG technicians at that customer’s address.

1 **Q. WHAT STEPS DOES SNG FOLLOW IN REGARD TO CONVERSIONS AS A**  
2 **MATTER OF PRACTICE?**

3 A. SNG follows a combination of local, state and international codes and  
4 recommended conversion practices.

5 **Q. IN HIS REBUTTAL TESTIMONY ON PAGE 5, LINES 7-23, MPGA WITNESS**  
6 **BROOKS STATES THAT IT IS “ANTI-COMPETITIVE” TO PROHIBIT THE USE**  
7 **OF BOTH PROPANE AND NATURAL GAS ON THE SAME PREMISES. DO**  
8 **YOU AGREE WITH THIS VIEWPOINT?**

9 A. No, I do not agree with Mr. Brooks’ statement. This is purely a safety issue.  
10 Having propane and natural gas feeding the same home or small business is  
11 inherently unsafe. Often firefighters shut off the source of gas they see. They  
12 have no idea that there is another gas supply feeding a structure and don’t realize  
13 that there exists a dangerous situation. Many jurisdictions require special permits  
14 to do so. As an example, attached as Surrebuttal Schedule DM-3 is a State of  
15 Massachusetts Special Permission Gas Dual Fuel Request Application Form that  
16 requires permission from the State and from a Fire Department authority.

17 **Q. HOW LONG HAS THE CURRENT TARIFF PROVISION PROHIBITING SUCH**  
18 **DUAL FUEL USAGE BEEN PLACE?**

19 A. As Mr. Brooks indicates, this prohibition has been in place in the Southern  
20 Missouri Natural Gas legacy system for eleven years (or since 2003).

21 **Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?**

1 A. Yes

**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                            )

Case No. GR-2014-0086

**AFFIDAVIT OF DAVID MOODY**

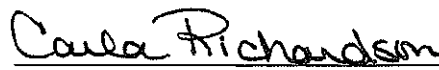
**STATE OF MISSOURI**                            )  
  )  
**COUNTY OF COLE**                            )

David Moody, being first duly sworn on his oath, states:

1. My name is David Moody and I work in Hollister, Missouri and I am employed as the President of Summit Natural Gas of Missouri.
2. Attached hereto and made a part of hereof for all purposes is my Surrebuttal Testimony on behalf of Summit Natural Gas of Missouri, Inc. consisting of 4 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.

  
\_\_\_\_\_  
David Moody

Subscribed and sworn to before me this 6th day of August, 2014.

  
\_\_\_\_\_  
Notary Public

My commission expires: 10-17-2016

CARLA RICHARDSON  
Notary Public - State of Missouri  
My Commission Expires October 17, 2016  
Taney County  
Commission #12405735