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October 17, 2014

Secretary / Chief Regulatory Law Judge Missouri Public Service Commission 200 Madison Street Jefferson City, MO 65102

Re: Summit Natural Gas of Missouri, Inc. (SNG) Winter PGA Filing

Attached are the electronic copies of P.S.C. MO No.1, Fourteenth Revised Sheet 51 and Eighth Revised Sheet 52, reflecting a change in the Purchased Gas Cost, the Actual Cost Adjustment, and Total PGA for each of the various schedules for both the Northern and Southern Divisions listed in the SNG Purchased Gas Adjustment (PGA) Clause. The territory previously known as Southern Missouri Natural Gas, L.P. will be included in a separate filing as the Company is currently maintaining two separate tariff books for the territory previously known as Missouri Gas Utility, Inc. and the territory previously known as Southern Missouri Natural Gas, L.P.

The SNG Purchased Gas Adjustment Clause requires the filing, between October 15 and Nov 4 each year, of the Regular Purchased Gas Adjustment (RPGA), which is defined on P.S.C. MO No.1, First Revised Sheet 47 as the Company's best estimate of the volumes and gas costs for the next period from the date of the first full billing after the filing is approved until the date of the first full billing after approval of a subsequent PGA filing. The Clause also requires a reconciliation of the PGA cost from the prior period with the actual costs incurred, and from that information and the projected volumes, the calculation of the annual Actual Cost Adjustment. The clause also includes provisions for Adjustments based on upstream pipeline Refunds and on Take-Or-Pay (T.O.P.) costs. SNG did not receive any Refunds or incur any T.O.P. costs during the past PGA period.

Attachment 1 is provided for both the Northern and Southern Divisions of SNG, and presents the spreadsheets used to calculate the RPGAs for the next PGA period and are titled accordingly.

Attachment 2 is the spreadsheet used to calculate the Actual Cost Adjustment balance by month for the prior PGA period, along with the amortization of that balance over the next PGA period volumes for both the



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Northern and Southern Divisions. Interest, calculated in accordance with Second Revised Sheet 46 instructions, is imbedded in the monthly Account 191 balances as shown on Attachment 2.

Attachment 3 is also provided for both the SNG Northern and Southern Divisions and reflects the seasonal revenue impact of the change in Total PGA between existing and proposed gas cost factors. The seasonal revenue impact for the Northern Division is an increase of \$204,432 or 42.11%. The seasonal revenue impact for the Southern Division is an increase of \$241,010, or 15.51%

The proposed Northern Division increase will cause an average winter month residential gas bill to increase by approximately \$ 21.22. This represents an 18.21% increase for the average month in the heating season. The proposed Southern Division increase will cause an average winter month residential gas bill to increase by approximately \$6.22. This represents a 6.55% increase for the average month in the heating season.

Summit Natural Gas of Missouri, Inc. respectfully requests that these rates become effective on November 1, 2014.

Sincerely,

Martha Wankum

Martha R. Wankum Manager, Missouri Regulatory Affairs Summit Natural Gas of Missouri, Inc.