

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

In the Matter of the Establishment of a Working)	
Case Regarding a Commission Rule Governing)	File No. AW-2021-0070
Revenue Stabilization Mechanisms)	

COMMENTS

Summit Natural Gas of Missouri, Inc. (“Summit”), pursuant to the September 23, 2020 Order in the above-captioned proceeding, submits its comments in consideration of revisions to the Missouri Public Service Commission’s (“Commission”) rules regarding revenue stabilization mechanisms (“RSM”).

Summit is supportive of rule amendments that create “clear filing requirements and other procedural rules” for revenue stabilization mechanisms, as described in the Staff Motion referenced in the Order. While Summit does not have specific suggestions for rule language at this time, Summit suggests that the proposed rule revisions not limit a utility as to which type of RSM it may apply for. Summit notes that there are different types of RSMs, including Weather Normalization Adjustment (“WNA”) and Volumetric Indifference Reconciliation to Normal (“VIRN”) RSMs. Each mechanism has different benefits, and no one type of RSM is applicable to all utilities in all cases. For this reason, Summit respectfully suggests that any rules established regarding RSMs should not limit the type of RSM a utility may apply for, as long as the mechanism addresses “the impact on utility revenues of increases or decreases in residential and commercial customer usage due to variations in either weather, conservation, or both”.

Summit appreciates the opportunity to submit these comments and looks forward to providing further comment on proposed revisions as part of this proceeding.

Dated this 12th day of October 2020.

Respectfully submitted,

By:

/s/ Matthew Kaply

Matthew Kaply

Senior Director of Regulatory Affairs & Rates

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