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VIA ELECTRONIC MAIL

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Missouri Public Service Commission
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Marc Poston
Public Counsel
Office of the Public Counsel
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RE: Meter Sampling Test Program Annual Report

Dear Ms. Dietrich and Mr. Poston:

Below please find Summit Natural Gas of Missouri, Inc.'s ("SNGMO") Meter Sampling Program Annual Report, pursuant to the Order Approving Stipulation and Agreement issued on September 5, 2018, in Case No. GE-2018-0193.

As required by SNGMO's Meter Sampling Test Program, included as Appendix A to the Non-Unanimous Stipulation and Agreement in Case No. GE-2018-0193, SNGMO implemented a Meter Sampling Test Program to test in-service American AC-250 gas meters during a four year test period beginning on January 1, 2019. During the four-year test period, SNGMO is to report its test results for the previous calendar year to Staff and OPC each year by the following March 15. Such report is to also include a progress update for the field verification four-year program.

In 2019, SNGMO implemented the statistical sample meter test program as required by the Non-Unanimous Stipulation and Agreement. As part of this program, meter lots[1] were identified in SNGMO's system and sample sizes were identified using the tables and charts specified in ANSI / ASQ Z1.4-2003 (R2013) (See Figure 1 below).

[1] As described in Appendix A to the Non-Unanimous Stipulation and Agreement in Case No. GE-2018-0193, a Lot is defined as "Meters of the Group with the same set year."

	AC-250		
	POP	CODE	SAMPLE
2000	1		1
2001	1		1
2002	0		
2003	0		
2004	3	A	2
2005	43	D	8
2006	62	E	13
2007	42	D	8
2008	356	H	50
2009	315	H	50
	823		133

Figure 1

The summary of test results by lot are documented in Figure 2 below. The summary indicates failure in the following test lots:

AC250: 2000, 2006, 2008, 2009.

	AC250			
Year Set	Tests Required	Tests Completed	Tests Failed	Lot Fail Level
2000	1	1	1	1
2001	1	1	0	1
2002				
2003				
2004	2	2	0	1
2005	8	8	0	2
2006	13	13	5	3
2007	8	8	1	2
2008	50	50	18	6
2009	50	50	14	6
	133	133	39	

Figure 2

With a sample of only one (1) meter for lot year 2000, no additional actions are being considered for the lot at this time. Through information obtained through SNGMO's four (4) year data correction project, there are five (5) meters contained in this lot for the 2020 test program. The results of testing in 2020 will help the Company determine if accelerated testing will be required for this lot in the future.

An analysis was performed on the remaining failed lots:

AC250: 2006, 2008, 2009.

	Manufacture Year			
AC-250	2005	2006	2008	2009
Lot 2006	5			
Lot 2008	1		17	
Lot 2009		1	4	9
Total	6	1	21	9

Based on this analysis, SNGMO proposes to remove AC250 meters manufactured in 2008 from the statistical test program and perform a four (4) year remediation program starting in 2021. During this period, SNGMO will remove identified meters and test and repair or retire identified meters per company test practices. An update on the four (4) year remediation program will be included with the applicable Meter Sampling Test Program Annual Reports.

SNGMO is monitoring the test results of AC250 meters manufactured in 2009. If this year of manufacture continues to exhibit an increasing failure rate, the Company will take appropriate actions to remediate these meters.

In 2019, SNGMO tested 2,819 meters that were not part of the AC250 four (4) year sampling plan. As of February 12, 2020, two-thousand two hundred twenty-two (2,222) of twenty-two thousand seven hundred eight (22,708) meters were reviewed in the Company's Customer Information System based on information gathered from the field. Work is continuing to meet the target of December 31, 2022, for completion of this Meter Data Correction Project.

If you have any questions, please contact 207-621-8000 x1454.

Sincerely,

/s/ Helen Ayotte

Helen Ayotte
Senior Director Engineer

Cc: Keith Lincoln
David Weeden
John Kottwitz
Whitney Payne
Dean Cooper