

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

In the Matter of the Establishment of a)	
Working Case for the Writing of a New)	
Rule on the Treatment of Customer)	
Information by Commission Regulated)	File No. AW-2018-0393
Electric, Gas, Steam, Heating, Water,)	
and Sewer Utilities and their Affiliates)	
and Non-Affiliates.)	

SNGMO’S RESPONSE REGARDING COST OF COMPLIANCE

COMES NOW, Summit Natural Gas of Missouri (“SNGMO” or “the Company”) and in response to the Missouri Public Service Commission’s (“Commission”) August 11, 2023 *Order Requesting Cost of Compliance Responses* ("Order"), respectfully states as follows:

DISCUSSION

1. While it is difficult to quantify the exact cost associated with implementation of the proposed new rule, SNGMO has determined that it would have to undergo renegotiation of a significant number of its contracts in order to effectuate these changes around data privacy and security. It is difficult to quantify the number of hours and capital associated as it would cover thousands of contracts. The amount of money and time would be different for each contract as it would depend on each counterparty’s position. It would also require renegotiating contracts that cover more than SNGMO if the contract is with Summit Utilities, Inc. but impacts SNGMO customers.

2. SNGMO currently approaches contracting and data security in the same way as the other operating companies under Summit Utilities, Inc. This change in approach would require the implementation of different systems for contracts in Missouri, different data storage for Missouri

customers, different trainings, and changes to several complicated policies that expand enterprise-wide and require various internal (and sometimes Summit Utilities, Inc.'s ownership's) approvals for Contracting Policy, Information Security Policy, Incident Response Policy, Responsible Contractor Policy, Operations and Maintenance Manual, and at least 10 other policies or procedures.

3. Again, while difficult to quantify, an estimated cost for renegotiating contracts and implementing new systems would require more than 1,000 hours and cost SNGMO millions of dollars in administrative, legal, customer care and IT divisions costs.

4. The Company recognizes data privacy and protection is an important issue in today's world of electronic information and must be taken seriously. All affiliate, non-affiliate and third parties are currently required to sign Summit's Cybersecurity addendum (or a variation of it). To comply with the broadened scope of the proposed definition of personally identifiable information with the subsets, many in-flight IT projects will be disrupted, resulting in moderate to substantial time and cost increases not yet quantified.

5. SNGMO understands the need to make the Privacy Policy readily available on a utility company's website. However, most companies already have this Policy on their websites, and SNGMO believes it is unnecessary to create separate language and incorporate it into our new customer packaging to specifically reference the website. Listing out the affiliates and non-affiliate third parties is overly burdensome and is subject to change based on current business practices, current law and regulations. The requirement that the Privacy Policy identifies all applicable laws, rules, orders, or judicial processes which cover disclosure would require constant updating and review as rules and laws are constantly changing around this matter. In addition, this borders on

unauthorized legal advice and a potential issue for both the customers and the utility in limiting what laws do and do not apply.

While the Company appreciates and understands the importance around these matters, more consideration should be given to the cost and feasibility of implementation before finalizing these rules.

Respectfully submitted,

/s/ Goldie T. Bockstruck

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**COUNSEL FOR
SUMMIT NATURAL GAS OF MISSOURI**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served electronically to all counsel of record on this 11th day of September, 2023.

/s/ Goldie Bockstruck

Goldie Bockstruck
Director of Regulatory Affairs