

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

In the Matter of Summit Natural Gas of )  
Missouri, Inc., Changes to Company's )  
Purchased Gas Adjustment "PGA" )  
Clause )

**Case No. GR-2022-0191**

**STAFF RECOMMENDATION REGARDING  
SUMMIT NATURAL GAS OF MISSOURI, INC.'S 2021-2022  
ACTUAL COST ADJUSTMENT FILING**

**COMES NOW** the Staff of the Missouri Public Service Commission in the above-captioned matter and files its Actual Cost Adjustment ("ACA") Recommendation in this case concerning Summit Natural Gas of Missouri, Inc.'s ("Summit") 2021-2022 ACA filing as set forth in the accompanying Staff Recommendation Memorandum (Appendix A), and further states as follows:

1. Summit filed its ACA for the 2021-2022 period in this case on November 2, 2022, for rates to become effective November 21, 2022. This filing revised the ACA rates based upon Summit's calculations of its ACA account balances for the 2021-2022 period. On November 4, and again on November 10, 2022, Summit filed three substitute tariff sheets bearing effective dates of November 17, 2022.<sup>1</sup>

2. The Commission's Procurement Analysis Department Staff ("Staff") has reviewed Summit's filing and submits its recommendation as further explained in the accompanying Staff Recommendation Memorandum, marked as Appendix A and incorporated by reference herein. Staff's analysis consisted of a review of Summit's natural gas supply plans including a review of Summit's gas purchasing practices to evaluate the prudence of the purchasing decisions for this ACA period; a

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<sup>1</sup> The substitutions were to change the effective date and to correct errors identified by Staff.

reliability analysis; and a hedging review. Staff's analysis also included a review of Summit's billed revenues compared with its actual gas costs to determine whether there exists an over-recovery or under-recovery of the ACA balance. An over-recovery is shown as a negative ACA balance that must be returned to customers; an under-recovery is shown as a positive ACA balance that must be collected from customers.

3. Based on its review, as discussed in further detail in the accompanying Staff Recommendation Memorandum (in "Public" and "Confidential" formats), Staff recommends the Commission issue an order requiring Summit to establish the ACA account balance to reflect the over-recovery and under-recovery balances as of August 31, 2022, as shown in the table in the "Recommendations" section of the Staff Recommendation Memorandum.

4. Based on its review Staff has certain comments, concerns and recommendations as set forth in the Billed Revenue, Actual Gas Cost, Reliability Analysis and Gas Supply Planning, Hedging sections, and summarized in the "Recommendation" section of the accompanying Staff Recommendation Memorandum. Staff recommends the Commission order Summit to respond to these concerns, comments, and recommendations within thirty (30) days.

**WHEREFORE**, for the reasons stated above and discussed in detail in the accompanying Staff Recommendation Memorandum, Staff recommends the Commission issue an order directing Summit to respond within thirty (30) days to Staff's concerns, comments, and recommendations set forth in the "Recommendations" section and to establish the ACA account balances to reflect the over-recovery and under-recovery balances as of August 31, 2022, as shown in the table in the "Recommendations" section of the Staff Recommendation Memorandum

Respectfully submitted,

**/s/ J. Scott Stacey**

J. Scott Stacey

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**ATTORNEY FOR STAFF OF THE  
PUBLIC SERVICE COMMISSION**

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record this 12<sup>th</sup> day of December, 2023.

**/s/ J. Scott Stacey**