

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

In the Matter of the Establishment of a Working     )  
Case for the Review and Consideration of     )     File No. GX-2024-0337  
Amending the Commission's Natural Gas     )  
Standards of Quality     )

**SUMMIT NATURAL GAS OF MISSOURI'S INITIAL COMMENTS**

COMES NOW Summit Natural Gas of Missouri (“Company” or “SNGMO”), and in response to the Missouri Public Service Commission's ("Commission") *Notice of Hearing and Comment Period* issued on May 23, 2024, submits the following comments:

SNGMO generally supports the Commission's approach to proposing standards for Renewable Natural Gas (“RNG”) quality and offers the following suggestions. The last sentence of 20 CSR 4240-10.030(11) states “Each gas utility, including municipal systems, receiving or transporting manufactured gas and RNG on its gas transmission and distribution systems shall provide, install, operate, maintain and continuously monitor sensors and testing equipment to determine if the quality of manufactured gas and RNG meets the requirements of section (10) of this rule.” It is unclear whether this language allows natural gas utilities to use third party contracts to ensure that natural gas producers adhere to natural gas utility standards, which are likely to be stricter than the requirements proposed by Commission. The language suggests that utilities must have the staff and equipment necessary to supervise and manage systems, leading to substantial and duplicative investments in monitoring and control systems. The producers of RNG will already be investing in monitoring and testing requirements due to the nature of their process. These costs will be included in their gas supply rates. Therefore, duplicating the monitoring and testing costs will unnecessarily increase the costs for the utility and its ratepayers.

SNGMO supports further discussion with Staff and other stakeholders around these important natural gas standards of quality.

WHEREFORE, SNGMO respectfully submits its Initial Comments.

/s/ **Goldie T. Bockstruck**

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