

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

In the Matter of the Application of )  
Summit Natural Gas of Missouri, Inc., for a )  
Variance from the Provision of Commission ) **Case No. GE-2024-0345**  
Rule 20 CSR 4240-10.030(19) to Revise its Meter )  
Testing Program )

**STAFF RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and for its *Staff Recommendation*, states as follows:

1. On May 24, 2024, Summit Natural Gas of Missouri, Inc. (“SNGMO”) filed an application with the Commission seeking variance of the requirements of periodic meter testing of utility meters by way of an expansion and continuation of its Pilot Meter Sampling Testing Program. Specifically, SNGMO requests waiver of 20 CSR 4240-10.030(19).

2. On May 28, 2024, the Commission issued an order setting a deadline for intervention applications of June 18, 2024, and directed Staff to file either a status report and request for additional time or a recommendation by no later than July 10, 2024. No applications to intervene were filed.

3. On July 10, 2024, Staff filed a request for additional time which the Commission granted on the same day. The order directed Staff to submit its recommendation or further status report no later than July 26, 2024.

4. As further described in the attached Memorandum, Staff investigated and analyzed SNGMO’s variance request through a thorough review of the Application, through discovery, and review of applicable Commission rules.

5. Based upon Staff's investigation and analysis, as set forth in the attached Memorandum and incorporated by reference herein, Staff recommends the Commission approve SNGMO's request for an additional six months for the Catch-up Program, extending the completion deadline to June 30, 2025. Since SNGMO has strived to meet the requested 2,600-meter tests goal during the current extension period, and that a limited number of meters are left to test, Staff is reasonably confident that SNGMO will not need more than the requested 6-month Catch-up Program extension.

6. Additionally, Staff recommends the Commission approve SNGMO's request for a permanent variance from its Meter Testing Rule. The Meter Testing Pilot Program that SNGMO has requested to be expanded and made permanent is in line with other permanent variances approved by the Commission.

7. Lastly, to ensure Staff's ability to evaluate meter testing by SNGMO in the future, Staff recommends the Commission order SNGMO to continue providing the yearly report ordered in GE-2018-0193 through 2025, and continue to retain the information provided in this report beyond 2025 so that it can be provided to Staff upon request during future rate cases.

**WHEREFORE**, Staff respectfully requests the Commission accept this recommendation, approve the requested extension, approve the request for permanent variance, order reporting through 2025 and retention of the report information going forward, and grant such other and further relief as the Commission considers reasonable in the circumstances.

Respectfully submitted,

**/s/ Tracy D. Johnson**

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**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, emailed or mailed, postage prepaid, to the parties of record as listed in the Service List maintained for this case by the Commission's Data Center, on this 25<sup>th</sup> day of July, 2024.

**/s/ Tracy D. Johnson**