

**STATE OF MISSOURI  
PUBLIC SERVICE COMMISSION**

At a session of the Public Service  
Commission held at its office in  
Jefferson City on the 21st day of  
August, 2024.

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

**ORDER APPROVING APPLICATION FOR VARIANCE**

Issue Date: August 21, 2024

Effective Date: September 20, 2024

On May 24, 2024,<sup>1</sup> Summit Natural Gas of Missouri, Inc. (SNGMO or Company) filed an application requesting an expansion and continuation of its Meter Sampling Pilot Program (Sampling Pilot Program) and extension of its Meter Testing Catch-Up Program (Catch-Up Program). The two variances<sup>2</sup> were originally approved in File No. GE-2018-0193 on four-year timelines, which were subsequently extended.<sup>3</sup> In the present case, SNGMO requested that its Sampling Pilot Program be expanded and made permanent. It also sought a variance extending the four-year Catch-up Program. Additionally, the Company requested waiver of the 60-day notice of case filing requirement under 20 CSR 4240-4.017(1).

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<sup>1</sup> All dates refer to 2024 unless otherwise indicated.

<sup>2</sup> Each variance relates to 20 CSR 4240-10.030(19).

<sup>3</sup> File No. GE-2018-0193, Order Approving Stipulation and Agreement, issued September 5, 2018; Order Approving Variance, issued October 21, 2020; Order Approving Variance, issued September 23, 2021; and Order Approving Variance, issued March 1, 2023.

The Commission directed a Recommendation from its Staff (Staff), and on July 26, Staff filed its Recommendation and attached Memorandum. Staff recommended that the Commission approve SNGMO's application subject to a condition which continues an annual reporting requirement and also requires that this information be retained so that it can be provided to Staff upon request during future rate cases. On August 5, SNGMO filed a pleading agreeing with Staff's Recommendation, and also indicated acceptance of the continued annual reporting and information retention of its meter testing program. No other responses to the application or to Staff's Recommendation have been received.

### **Sampling Pilot Program**

SNGMO would like to transition its Sampling Pilot Program into a permanent variance starting January 1, 2025. In addition to making the Sampling Pilot Program permanent, the Company also requested to add meters with a rated capacity of up to 500 cubic feet per hour (cfh). In other words, SNGMO's previously granted variance, scheduled to end December 31, 2024, would expand to cover meters with a capacity of 500 cfh and also be made permanent. The variance requested is from Commission Rule 20 CSR 4240-10.030(19), which outlines the requirements for periodic meter testing of utility meters.

Staff stated that the Sampling Pilot Program that SNGMO has requested to be expanded and made permanent is in line with other permanent variances approved by the Commission. For example, Ameren Missouri has been approved for its meter test plan to include meters with capacities up to 660 cfh.

SNGMO has completed its four-year Sampling Pilot Program, and is in the process of analyzing multiple failed lots which it found in the process. The Company is currently

removing and replacing additional sampled meters to aid in determining the cause of these failed lots.

### **Catch-Up Program**

SNGMO requested an additional six months to complete its Catch-Up Program for meter testing, moving its completion date to June 30, 2025. In 2023, a total of 2,662 meters were tested, and the Company plans to test at least another 2,662 in 2024. However, this will leave 627 meters still requiring removal and testing in 2025. Staff stated it was reasonably confident that SNGMO will not need more than the requested 6-month extension since SNGMO has striven to meet the requested 2,600-meter tests goal during the current extension period and due to the limited number of meters left to test. Once the Catch-Up Program is complete, SNGMO will no longer be required to test an increased number of meters each year.

### **Discussion**

Commission Rule 20 CSR 4240-10.030(19) provides that every gas service meter installed shall be periodically removed, inspected and tested at least once every 120 months. The Rule also authorizes the Commission to order the removal, inspection, and testing of meters to be completed on a time-line other than the stated 120 months. The Commission has reviewed and considered SNGMO's application and Staff's Recommendation and Memorandum and determines the two variances at issue – expanding the Sampling Pilot Program to meters with capacities up to 500 cfh and making the Sampling Pilot Program permanent; and extending the Catch-Up Program to June 30, 2024 – are reasonable and will grant them subject to the annual reporting condition recommended by Staff.

In addition, the Commission will grant SNGMO's request for waiver of the 60-day notice requirement under 20 CSR 4240-4.017(1). The Commission finds good cause exists for waiver, based on the Company's verified declaration that it had no communication with the Commission regarding substantive issues in the application within 150 days before filing its application.<sup>4</sup>

**THE COMMISSION ORDERS THAT:**

1. SNGMO's application for variances from Commission Rule 20 CSR 4240-10.030(19) in the form of its Sampling Pilot Program and Catch-Up Program is granted subject to the condition to continue filing annual reports and retaining information as set forth below.

2. SNGMO's Sampling Pilot Program, previously authorized in File No. GE-2018-0193, is expanded to include gas meters with capacities up to 500 cfh, and is made permanent.

3. The completion date for SNGMO's Catch-Up Program, previously authorized in File No. GE-2018-0193, is extended to June 30, 2025.

4. SNGMO shall continue to file annual reports on the Sampling Pilot Program and the Catch-Up Program through 2025, and shall continue to collect and retain this information thereafter so that it can be provided to Staff upon request during future rate cases.

5. The 60-day notice requirement of Commission Rule 20 CSR 4240-4.017(1) is waived for good cause.

6. This order shall be effective on September 20, 2024.

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<sup>4</sup> 20 CSR 4240-4.017(1)(D).

7. This file shall close on September 21, 2024.



**BY THE COMMISSION**

*Nancy Dippell*

Nancy Dippell  
Secretary

Hahn, Ch., Coleman, Holsman  
Kolkmeier, and Mitchell CC., concur.

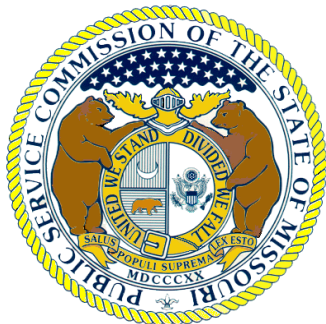
Hatcher, Senior Regulatory Law Judge

**STATE OF MISSOURI**

**OFFICE OF THE PUBLIC SERVICE COMMISSION**

**I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.**

**WITNESS my hand and seal of the Public Service Commission, at Jefferson City, Missouri, this 21<sup>st</sup> day of August 2024.**



*Nancy Dippell*  
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**Nancy Dippell**  
**Secretary**

**MISSOURI PUBLIC SERVICE COMMISSION**

**August 21, 2024**

**File/Case No. GE-2024-0345**

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**Enclosed find a certified copy of an Order or Notice issued in the above-referenced matter(s).**

**Sincerely,**



**Nancy Dippell  
Secretary**

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Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.