

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

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

Case No. GR-2025-0147
Tariff No. JG-2025-0063

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") and for its Recommendation, states as follows:

1. On November 4, 2024, Summit Natural Gas of Missouri, Inc. ("SNGMO") filed three (3) tariff sheets bearing an effective date of November 19, 2024, Tariff File No. JG-2025-0063, and an accompanying cover letter with supporting worksheets. The tariff sheets were filed to reflect changes in SNGMO's Regular Purchased Gas Adjustment ("RPGA") factors as a result of estimated changes in the cost of natural gas. Also included in this filing is the annual change to the Actual Cost Adjustment ("ACA").

2. The Commission issued an order on November 5, 2024, directing Staff to file a recommendation regarding SNGMO's request and corresponding tariff sheets, Tariff File No. JG-2025-0063, no later than November 12, 2024.

3. On November 6, 2024, SNGMO filed three (3) sets of substitute tariff sheets with effective dates of November 19, 2024. SNGMO also filed a revised cover letter and supporting worksheets with the substitute tariff sheets.

4. Staff has reviewed SNGMO's filings, including the November 6, 2024, substitute tariff sheet filing with an effective date of November 19, 2024, and determined that the rates in the proposed tariff sheets, Tariff No. JG-2025-0063, were calculated in conformance with SNGMO's PGA Clause. Staff does not oppose the approval of these

tariff sheets on less than thirty (30) days' notice. Such action is supported by SNGMO's Commission-approved PGA Clause allowing for ten (10) business days' notice for PGA change filings.

5. Case No. GR-2025-0147, under which these changes were filed, was established to track SNGMO's PGA factors to be reviewed in its 2023-2024 ACA filing. Case No. GR-2024-0157 was established to track the Company's PGA factors to be reviewed in its 2022-2023 ACA filing. These rate changes should be made on an interim basis, subject to refund ending final Commission decisions in ACA Case No. GR-2024-0157 (2022-2023 ACA filing) and ACA Case No. GR-2025-0147 (2023-2024 ACA filing).

6. Staff recommends the Commission approve the substitute tariff sheets in Tariff File No. JG-2025-0063 as filed on November 6, 2024, on an interim basis, subject to refund, for service on and after November 19, 2024.

7. Due to the limited time available to review the documentation supporting the ACA factors SNGMO submitted in this filing, Staff requests the Commission order Staff to submit its results and recommendations regarding the information in this ACA filing to the Commission on or before December 15, 2025.

WHEREFORE, for the foregoing reasons and those stated in Staff's Memorandum attached hereto, Staff recommends that the Commission issue an order approving SNGMO's substitute tariff sheets filed in Tariff No. JG-2025-0063 on November 6, 2023, on an interim, subject to refund status; and further order Staff to file its recommendation SNGMO's ACA filing no later than December 15, 2025.

P.S.C. MO No. 3

12th Revised Sheet No. 56, Cancelling 11th Revised Sheet No. 56

12th Revised Sheet No. 57, Cancelling 11th Revised Sheet No. 57

12th Revised Sheet No. 58, Cancelling 11th Revised Sheet No. 58

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 7th day of November, 2024.

/s/ J. Scott Stacey

MEMORANDUM

TO: Missouri Public Service Commission Official Case File,
File No. GR-2025-0147, Tariff No. JG-2025-0063
Summit Natural Gas of Missouri, Inc.

FROM: Lisa Schlup, Lead Senior Utility Regulatory Auditor
Procurement Analysis Dept.

/s/ David M. Sommerer 11/7/2024
Financial and Business Analysis Div./Date

SUBJECT: Staff Recommendation for Summit Natural Gas of Missouri, Inc. Scheduled Winter
PGA Filing Effective Date November 19, 2024

DATE: November 7, 2024

On November 4, 2024, Summit Natural Gas of Missouri, Inc. (“SNGMO” or “Company”), filed three (3) tariff sheets bearing a proposed effective date of November 19, 2024, Tariff No. JG-2025-0063. In addition, SNGMO filed a single cover letter and supporting worksheets.

On November 6, 2024, SNGMO filed three (3) revised substitute tariff sheets bearing a proposed effective date of November 19, 2024, a single cover letter and supporting worksheets. The revised substitute tariff sheets were filed to correct SNGMO’s Purchased Gas Adjustment (“PGA”) factors as the result of estimated changes in the cost of natural gas for the upcoming winter season and changes to the Actual Cost Adjustment (“ACA”) factors.

On November 5, 2024, the Commission issued its “**Order Directing Expedited Staff Recommendation and Setting Time for Responses**”. The order directs Staff to file its recommendation no later than November 12, 2024.

The filing revises the following existing tariff pages:

P.S.C. MO No. 3, 11th Revised Sheet No. 56
P.S.C. MO No. 3, 11th Revised Sheet No. 57
P.S.C. MO No. 3, 11th Revised Sheet No. 58

This filing proposes decreases in Regular Purchased Gas Adjustment (RPGA) rates per Ccf for all customer classes by division as noted below:

Division	Current RPGA	ACA	Current Total PGA
Gallatin	\$ 0.5046	\$ 0.0155	\$ 0.5201
Warsaw/Lake of the Ozarks	\$ 0.6400	\$ 0.5007	\$ 1.1407
Rogersville/Branson	\$ 0.6746	\$ 0.4487	\$ 1.1233

Division	Proposed RPGA	ACA	Proposed Total PGA
Gallatin	\$ 0.4447	\$ (0.0820)	\$ 0.3627
Warsaw/Lake of the Ozarks	\$ 0.5943	\$ 0.5413	\$ 1.1356
Rogersville/Branson	\$ 0.5973	\$ 0.5316	\$ 1.1289

Division	RPGA Current	RPGA Proposed	Increase/ (Decrease)
Gallatin	\$ 0.5046	\$ 0.4447	\$ (0.0599)
Warsaw/Lake of the Ozarks	\$ 0.6400	\$ 0.5943	\$ (0.0457)
Rogersville/Branson	\$ 0.6746	\$ 0.5973	\$ (0.0773)

SNGMO’s revised cover letter makes the following representations:

“These revised tariff sheets reflect the Purchased Gas Adjustment (“PGA”) of the Company as set forth in the Company’s tariffs, as well as the carrying cost rates for Winter Storm Uri as stipulated by the Parties and approved by the Commission in Case No. GR-2022-0122. These revisions include adjustments to the Regular Purchased Gas Adjustment (“RPGA”) and Actual Cost Adjustment (“ACA”) factors.

The changes in the PGA factors applicable to the Company’s Gallatin Division will decrease the firm sales customers’ total PGA rate from \$0.5201/Ccf to \$0.3627/Ccf. The proposed decrease will cause an average winter month residential gas bill to decrease by approximately \$18.00. This represents a 30.27% decrease for the average residential customer’s monthly bill during the heating season.

The changes in the PGA factors applicable to the Company’s Warsaw and Lake of the Ozarks Divisions will decrease the firm sales customers’ total PGA rate from \$1.1407/Ccf to \$1.1356/Ccf. The proposed decrease will cause an average winter month residential gas bill to decrease by approximately \$0.23. This represents a 0.44% decrease for the average residential customer’s monthly bill during the heating season.

The changes in the PGA factors applicable to the Company’s Rogersville and Branson Divisions will increase the firm sales customers’ total PGA rate from \$1.1233/Ccf to \$1.1289/Ccf. The proposed increase will cause an average winter month residential gas bill to increase by approximately \$0.49. This represents a 0.50% increase for the average residential customer’s monthly bill during the heating season.”

Case No. GR-2025-0147, under which these changes were filed, was established to track SNGMO's PGA factors to be reviewed in its 2023-2024 ACA filing. Case No. GR-2024-0157 was established to track the Company's PGA factors to be reviewed in its 2022-2023 ACA filing. These rate changes should be made on an interim basis, subject to refund pending final Commission decisions in ACA Case No. GR-2024-0157 (2022-2023 ACA filing) and ACA Case No. GR-2025-0147 (2023-2024 ACA filing).

Due to the limited time available to review the documentation supporting the ACA factors submitted in this filing, the Procurement Analysis Department ("PAD") requests permission to submit its results and recommendations regarding the information included in this ACA filing to the Commission on or before December 15, 2025. The ACA procedure involves the review of and true-up to actual gas costs.

The Staff has verified that the Company has filed its annual report and is not delinquent on any assessment. Staff has reviewed this filing and is not aware of any issue currently pending before the Commission that affects or is affected by this filing, other than those mentioned above.

Staff has reviewed this filing and determined that the rates on the proposed tariff sheets were calculated in conformance with SNGMO's PGA Clause. Staff asks the Commission to take notice of SNGMO's tariff language that allows for approval of these tariff sheets on less than thirty (30) days' notice is demonstrated by SNGMO's Commission-approved PGA clause allowing for ten (10) business days for PGA change filings. Therefore, Staff recommends that the following revised substitute tariff sheets filed on November 6, 2024, and effective on November 19, 2024, be approved on an interim basis, subject to refund:

P.S.C. MO No. 3

12th Revised Sheet No. 56, Cancelling 11th Revised Sheet No. 56

12th Revised Sheet No. 57, Cancelling 11th Revised Sheet No. 57

12th Revised Sheet No. 58, Cancelling 11th Revised Sheet No. 58

