

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

In the Matter of the Application of Summit Natural)
Gas of Missouri Inc., for Approval of a Tariff) File No. GT-2025-_____
Revision Related to the Equipment Rebate)
Program Pilot)

**APPLICATION FOR APPROVAL OF TARIFF REVISION
TO EXTEND EQUIPMENT REBATE PROGRAM PILOT
AND REQUEST FOR WAIVER**

COMES NOW Summit Natural Gas of Missouri, Inc. (“SNGMO” or the “Company”),
and, as its *Application for Approval of Tariff Revision to Extend Equipment Rebate Program Pilot
and Request for Waiver* (“Application”), states as follows:

APPLICANT

1. SNGMO is a wholly owned subsidiary of Summit Utilities, Inc., and is a corporation duly incorporated under the laws of the State of Colorado with its principal offices located at 10825 E. Geddes Avenue, Suite 410, Centennial, Colorado 80112. A copy of a certificate from the Missouri Secretary of State that SNGMO is authorized to do business in Missouri as a foreign corporation was submitted in Case No. GE-2024-0345 and is incorporated herein by reference in accordance with Commission Rule 20 CSR 4240-2.060(1)(G). Other than cases that have been docketed at the Commission, SNGMO has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court within the past three years that involve customer service or rates. SNGMO has no annual report or assessment fees that are overdue.

2. SNGMO conducts business as a “gas corporation” and a “public utility” as those terms are defined in Section 386.020, RSMo, and provides natural gas service in the Missouri counties of Harrison, Daviess, Caldwell, Pettis, Benton, Morgan, Camden, Miller, Greene,

Webster, Laclede, Wright, Douglas, Texas, Howell, Lawrence, Barry, Stone, and Taney, subject to the jurisdiction of the Commission as provided by law.

3. All correspondence, communications, notices, orders and decisions of the Commission with respect to this matter should be sent to the undersigned counsel.

BACKGROUND

4. SNGMO's energy efficiency program is included in its tariff as the Equipment Rebate Program (ERP) Pilot (Sheets Nos. 92-95). The purpose of the ERP Pilot is to: (1) promote the installation of high efficiency natural gas equipment within SNGMO's service territories by offering rebates that are expected to be cost effective; and, (2) to perform an evaluation of the program implementation and results. (*See* Sheet No. 92).

5. The measures proposed for the ERP Pilot include common market-ready technologies included in other successful utility energy efficiency programs such as high efficiency furnaces, tankless water heaters, and thermostats. SNGMO provides a financial incentive in the form of a rebate check to eligible participants who purchase and install qualifying natural gas equipment identified in the table found in the tariff sheets attached hereto as **Appendix A**. Rebate forms are made available for download through the Company website (<https://summitnaturalgas.com/rebates>). Participants will mail in or submit online the completed rebate application form along with copies of all required supporting documentation. SNGMO will process the rebate request and either mail the customer a check or a denial letter stating why the rebate application and/or installed equipment does not qualify within four to six (4-6) weeks. (*Id.*). The ERP Pilot also includes a trade ally rebate incentive that allows the Company to provide a \$50 rebate to trade allies for each piece of high efficiency equipment installed as a means to further promote installation of high efficiency equipment in its service territory. The Company was granted a waiver from the Commission's promotional practice rules, which allowed the

Company to pursue its trade ally rebate program, in Case No. GE-2023-0104. SNGMO intends to continue the trade ally rebate program in future program years.

6. Lastly, the Program also includes water savings measures through its water efficiency kits and stand alone water efficiency equipment, including low-flow showerheads and faucet aerators. Such equipment will save gas usage where water is heated using a gas hot water heater. These measures are also available through the Company's online marketplace at either no cost or at a discounted rate, depending on the equipment.

7. SNGMO's ERP Pilot was first initiated through the filing of proposed tariff sheets on September 14, 2018. (Tracking No. JG-2019-0045) and was implemented effective October 14, 2018. The initial ERP Pilot program ran from 2018 through the end of 2021. In 2021, SNGMO requested and received an extension of the ERP Pilot program through December 31, 2024 in File No. GT-2022-0052.

8. SNGMO is required to submit annual reports for its ERP Pilot each February. The annual reports include (1) a narrative description of the status of each program, (2) information (by program) on actual program expenditures and estimated impacts, and (3) a comparison (by program) of budgeted expenditures and impacts (CCF's, to the extent reasonably available) to actual expenditures and impacts. (*See* Sheet No. 94). The annual reports required as of February 28, 2023, February 29, 2024, and February 28, 2025 have been timely submitted.

9. Further, it was required that the evaluation, measurement and verification of the ERP Pilot be performed by an independent, third-party evaluator. The evaluation plan was to begin October 1, 2024, and the Evaluation Report submitted with the Program Year 2024 Annual Report on February 28, 2025. The required third-party evaluation was timely provided by SNGMO.

10. Among other things, the ERP Pilot stated that it would run from January 1, 2022,

through December 31, 2024. SNGMO believes that the ERP Pilot has thus far satisfied its objectives and that over the last few years the Company has made notable enhancements to the administration and promotion of its program. The Company requests the ERP Pilot be extended until December 31, 2027, in order to allow the Company to continue to offer efficiency savings to its customers and obtain additional experience with the program and evaluation of its performance.

PROPOSED TARIFF REVISIONS

11. It is SNGMO's proposal that its tariff be revised to allow minor updates to the tariff language, to: (1) reflect the term "water efficiency measures" as opposed to "water kits", in order to more accurately reflect the incorporation of standalone water efficiency measures in the Pilot program; (2) include language consistent with the Commission's order in Case No. GE-2023-0104, to include the trade ally rebate program; and (3) revisions to reflect the extension of the ERP Pilot termination date and the associated adjustment of reporting and evaluation dates.

12. Concurrent with the filing of this Application, SNGMO has filed P.S.C. MO No. 3, 2nd Revised Sheet No. 92, Cancelling 1st Revised Sheet No. 92; 2nd Revised Sheet No. 93, Cancelling 1st Revised Sheet No. 93; 2nd Revised Sheet No. 94, Cancelling 1st Revised Sheet No. 94; and 2nd Revised Sheet No. 95, Cancelling 1st Revised Sheet No. 95, for the purpose of extending the ERP Pilot until December 31, 2027. (Tracking No. JG-2025-0144). The referenced tariff sheets contain an issue date of April 3, 2025, and a proposed effective date of May 3, 2025. SNGMO requests that the Commission approve the proposed tariff sheets.

REQUEST FOR WAIVER

13. SNGMO has not filed a 60 day notice pursuant to 20 CSR 4240-4.017(1) and requests a waiver of this requirement. Rule 20 CSR 4240-4.017(1)(D) provides that a waiver may be granted for good cause. Good cause exists in this case. SNGMO declares (as verified below)

that it has had no communication with the office of the Commission (as defined by Commission Rule 20 CSR 4240-4.015(10)) within the prior 150 days regarding any substantive issue likely to be in this case. Accordingly, to the extent that the Commission may find it to be applicable, and for good cause shown, SNGMO moves for a waiver of the 60 day notice requirement of Rule 20 CSR 4240-4.017(1) and acceptance of this Application.

WHEREFORE, SNGMO respectfully requests that the Commission issue an order granting the requests identified herein.

Respectfully submitted,

BRYDON, SWEARENGEN & ENGLAND P.C.



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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 3rd day of April, 2025, to:

General Counsel's Office
staffcounsel@psc.mo.gov

Office of the Public Counsel
opcservice@opc.mo.gov



VERIFICATION

State of Arkansas)
)ss
County of Washington)

I, Clark Medlock, having duly sworn upon my oath, state that I am Director of Energy Efficiency Programs of Summit Utilities, Inc., and that I have knowledge of matters stated herein, and that the matters and things stated in the foregoing Application are true and correct to the best of my information, knowledge and belief.



4/3/2025

Date

P.S.C. MO No. 3	Cancelling	2 nd Revised 1 st Revised	Sheet No. 92 Sheet No. 92
All Towns and Communities For: <u>Within SNG-MO Certificated Service Areas</u> Name of Issuing Company Community, Town or City			
<u>EQUIPMENT REBATE PROGRAM PILOT</u>			
PURPOSE The purpose of the Equipment Rebate Program (ERP) Pilot is to (1) promote the installation of high efficiency natural gas equipment within Summit Natural Gas of Missouri's (SNGMO or Company) service territories by offering rebates that are expected to be cost effective and (2) to perform an evaluation of the program implementation and results.			
DEFINITIONS <u>Administrator</u> – SNGMO will administer the program <u>Participant</u> – A customer that submits a rebate application to the Administrator after the installation and commissioning of qualifying equipment or requests a free opt-in water efficiency kit. <u>Participant Cost Test (PCT)</u> – The test of cost-effectiveness of demand-side programs that measures the economics of a demand-side program from the perspective of the participants in the program. <u>Program Year</u> – January 1 through December 31 <u>Total Resource Cost Test (TRC)</u> – The test of the cost-effectiveness of demand-side programs that compares the avoided utility costs to the sum of all incremental costs of end-use measures that are implemented due to the program (including both utility and participant contributions), plus utility costs to administer, deliver, and evaluate each demand-side program. <u>Trade Ally</u> - Installers assisting eligible customers with the rebate submission process for eligible high efficiency gas equipment (furnaces, water heaters, and boilers).. <u>Utility Cost Test (UCT)</u> – The test that compares the avoided utility costs to the sum of all utility incentive payments, plus utility costs to administer, deliver, and evaluate each demand-side program for supply-side resources.			
PROGRAM DESCRIPTION The measures proposed for the ERP Pilot include common market-ready technologies included in other successful utility energy efficiency programs. SNGMO will provide a financial incentive in the form of a rebate check to eligible Participants who purchase and install qualifying natural gas equipment identified in the table below. Rebate forms will be available for download on the Company website (https://summitnaturalgas.com). Participants will mail in the completed rebate application form along with copies of all required supporting documentation. Participants will also have the option to submit a completed rebate form online through the Company website. SNGMO will process the rebate request and either mail the customer a check or a denial letter stating why the rebate application and/or installed equipment does not qualify within four to six (4-6) weeks. * Indicates new rate or text + Indicates change			

Issue Date: April 3, 2025
Month/Day/Year

Effective Date: May 3, 2025
Month/Day/Year

Issued By: Goldie Bockstruck
Director of Regulatory Affairs
Name and Title of Issuing Officer

10825 Geddes Ave Suite 410
Centennial Colorado 80127
Company Mailing Address

P.S.C. MO No. 3

Cancelling

2nd Revised

1st Revised

Sheet No. 93

Sheet No. 93

All Towns and Communities

Summit Natural Gas of Missouri, Inc. For: Within SNG-MO Certificated Service Areas
Name of Issuing Company Community, Town or City

EQUIPMENT REBATE PROGRAM PILOT (CONT'D)

Measure	Efficiency Level	Customer Rebate
Boiler	90% AFUE or higher	\$300
Furnace	90-94.9% AFUE	\$400
	95% AFUE or higher	\$500
Tankless Water Heater	0.90 EF or higher	\$400
Smart Thermostat	ENERGY STAR-certified	\$100

Water efficiency measures will be offered as opt-in water efficiency kits or stand-alone measures. Opt-in water efficiency kits will be mailed to Participants who request them at no charge. These kits will include low flow shower heads, faucet aerators, and a water temperature card to help Participants reduce both water and associated natural gas consumption. Three kits, designed for one (1), one and a half (1.5) and two (2) bathroom homes, will be offered. Requests for opt-in water efficiency kits will be accepted through an online submission form on the Company's website, and orders will be processed periodically in batches, based on demand. Stand-alone water efficiency measures, such as low-flow showerheads and faucet aerators will also be available at a reduced cost to Participants.

SNGMO staff will provide the overall strategic direction and administration of the program. SNGMO may process equipment rebate applications and fulfill opt-in water efficiency measures requests in-house or procure an outside vendor.

SNGMO will market the program primarily through the Company website, bill stuffers and brochures. Radio or print advertising may also be utilized to drive participation.

In the event of program oversubscription, the Company may:

1. Establish a waiting list for payment of pending rebates in the following program year.
2. File for a program budget modification.
3. Notify customers via the Company website that program funds have been exhausted and remove links to the rebate forms.

AVAILABILITY

Equipment rebates under this program are available to active SNGMO customers who install qualifying equipment and receive service under the following rates:

1. General Service (GS) in Gallatin, Warsaw and Lake of the Ozarks
2. GS-Residential in Rogersville and Branson
3. Commercial Service (CS) within all SNGMO's service territories

Any active SNGMO customer, owner or tenant, within an eligible rate class may participate in the ERP Pilot; however, the installed measure must save energy (natural gas) delivered by SNGMO.

* Indicates new rate or text

+ Indicates change

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Company Mailing Address

P.S.C. MO No. 3	Cancelling	2 nd Revised 1 st Revised	Sheet No. 94 Sheet No. 94
All Towns and Communities For: <u>Summit Natural Gas of Missouri, Inc.</u> <u>Within SNG-MO Certificated Service Areas</u> Name of Issuing Company Community, Town or City			
<u>EQUIPMENT REBATE PROGRAM PILOT (CONT'D)</u>			
* * * *	<p>TRADE ALLY REBATES – As approved in Commission Case No. GE-2023-0104, a \$50 rebate will be offered to installers assisting eligible customers with the rebate submission process for each eligible unit of high efficiency gas equipment (furnaces, water heaters, and boilers) installed. Fuel switching installations are not eligible for a Trade Ally Rebate.</p> <p>Additional terms and conditions may be included on the Company's website, marketing materials, and rebate application forms.</p>		
+ + +	<p>REPORTING</p> <p>The Company will submit the ERP Pilot annual report on February 28, 2026, which will cover Program Year 2025. Subsequent annual reports will be submitted on February 28, 2027 and February 28, 2028. The annual reports shall include (1) a narrative description of the status of each program, (2) information (by program) on actual program expenditures and estimated impacts, and (3) a comparison (by program) of budgeted expenditures and impacts (CCF's, to the extent reasonably available) to actual expenditures and impacts.</p>		
+	<p>EVALUATION PLAN</p> <p>The evaluation, measurement and verification of the rebate program will be performed by an independent, third-party evaluator. The overall evaluation objectives will be to provide an impact evaluation including determining gross and net savings attributable to the ERP Pilot. Gross savings will be determined through a calibrated engineering approach (i.e., reviewing the program tracking data for actual equipment characteristics, such as efficiency levels, and updating the engineering algorithms accordingly). Net savings will be determined through a review of secondary data from similar programs. The evaluation contractor will also interview program and implementation staff to determine their perspective on the strengths and limitations of the ERP Pilot. Cost effectiveness tests (TRC, UCT and PCT) will be completed by the evaluator. The evaluation plan will begin October 1, 2027 and the Evaluation Report will be submitted with the Program Year 2027 Annual Report on February 28, 2028.</p>		
+	<p>PROGRAM BUDGET</p> <p>The annual budget for the ERP Pilot will be \$150,000 for each Program Year. Program funds will be used to cover (1) rebates paid directly to program participants and Trade Allies and (2) utility costs to administer, deliver, and evaluate the program. Funding for this program is set forth in the Stipulation and Agreement in Case No. GR-2014-0086.</p>		
+	<p>COST RECOVERY</p> <p>The Company shall be authorized to accumulate any energy efficiency costs for which there is a general consensus among the Advisory Group members in a regulatory asset account as the costs are incurred, for potential recovery in a future rate case. The regulatory asset account shall accrue interest at the Company's short-term debt rate through the Company's next rate case. Program costs in the regulatory asset account that have been prudently incurred will be included in rate base in the Company's next general rate case and amortized over six (6) years.</p> <p>* Indicates new rate or text + Indicates change</p>		

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P.S.C. MO No. 3	Cancelling	2 nd Revised 1 st Revised	Sheet No. 95 Sheet No. 95
<u>Summit Natural Gas of Missouri, Inc.</u> Name of Issuing Company		All Towns and Communities For: <u>Within SNG-MO Certificated Service Areas</u> Community, Town or City	
<u>EQUIPMENT REBATE PROGRAM PILOT (CONT'D)</u>			
<div style="display: flex; align-items: flex-start;"> <div style="width: 20px; text-align: center; margin-right: 10px;">+</div> <div> <p>PROGRAM TERM</p> <p>The ERP Pilot will run from January 1, 2025 through December 31, 2027, unless funding for this program does not continue due to the elimination of funding resulting from a Commission order. The implementation of any changes to the tariff are contingent upon approval of this tariff.</p> <p>ENERGY EFFICIENCY ADVISORY GROUP</p> <p>An Energy Efficiency Advisory Group (Advisory Group) was established as a result of Commission order in Case No. GR-2014-0086. The Advisory Group will continue to provide feedback to the Company regarding the design, implementation, and evaluation of its energy efficiency programs. The Advisory Group shall convene meetings or conference calls at least one time per year, at which the Company shall provide updates on:</p> <ol style="list-style-type: none"> 1. The status of program design and implementation, including the amount of expenditures for the program and the level of customer participation. 2. The status of program evaluations, including consultants chosen, evaluation budgets, evaluation expenditures, and copies of any interim and final evaluations. 3. The status of new program selection and design efforts. <p style="margin-top: 20px;">* Indicates new rate or text + Indicates change</p> </div> </div>			

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