

Exhibit No.:  
Issues: Miscellaneous Charges  
Witness: Michael J. Ensrud  
Sponsoring Party: MO PSC Staff  
Type of Exhibit: Surrebuttal Testimony  
Case No.: GR-2014-0086  
Date Testimony Prepared: August 8, 2014

**MISSOURI PUBLIC SERVICE COMMISSION**

**REGULATORY REVIEW DIVISION**  
**Tariff, Safety, Economic & Engineering Analysis**

**SURREBUTTAL TESTIMONY**

**OF**

**MICHAEL J. ENSRUD**

**SUMMIT NATURAL GAS OF MISSOURI, INC.**

**CASE NO. GR-2014-0086**

*Jefferson City, Missouri*  
*August 2014*

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

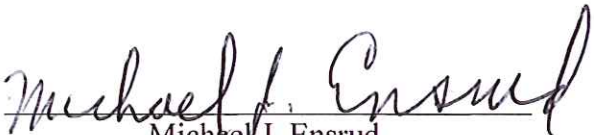
In the Matter of Summit Natural Gas of )  
Missouri Inc.'s Filing of Revised Tariffs )  
To Increase its Annual Revenues For )  
Natural Gas Service )

Case No.: GR-2014-0086

**AFFIDAVIT OF MICHAEL J ENSRUD**

STATE OF MISSOURI    )  
                                  ) ss  
COUNTY OF COLE     )

Michael J. Ensrud, of lawful age, on his oath states: that he has participated in the preparation of the following Surrebuttal Testimony in question and answer form, consisting of 3 pages of Surrebuttal Testimony to be presented in the above case, that the answers in the following Surrebuttal Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true to the best of his knowledge and belief.

  
Michael J. Ensrud

Subscribed and sworn to before me this 7<sup>th</sup> day of August, 2014.

LAURA BLOCH Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: June 21, 2015 Commission Number: 11203914
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**SURREBUTTAL TESTIMONY**

**OF**

**MICHAEL J. ENSRUD**

**SUMMIT NATURAL GAS OF MISSOURI**

**CASE NO. GR-2014-0086**

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1 | **SURREBUTTAL TESTIMONY**

2 | **OF**

3 | **MICHAEL J. ENSRUD**

4 | **SUMMIT NATURAL GAS OF MISSOURI**

5 | **CASE NO. GR-2014-0086**

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12 | Q. Please state your name and business address.

13 | A. My name is Michael J. Ensrud, P.O. Box 360, Jefferson City, Missouri 65102.

14 | Q. Are you the same Michael J. Ensrud who filed rebuttal testimony and  
15 | schedules in this case?

16 | A. Yes. I am.

17 | **PURPOSE OF SURREBUTTAL TESTIMONY**

18 | Q. What is the purpose of your surrebuttal testimony?

19 | A. The purpose of my surrebuttal testimony is to address the rebuttal testimony of  
20 | Office of the Public Counsel's ("OPC's") witness Barbara Meisenheimer.

21 | **OFFICE OF PUBLIC COUNSELS PROPOSAL ON MISCELLANEOUS**  
22 | **CHARGES**

23 | Q. Does Staff agree with OPC witness Barbara Meisenheimer miscellaneous tariff  
24 | rate proposal as stated in her rebuttal testimony, page 51, lines 5 - 9?

25 | A. No. OPC has not performed any cost analyses of these charges and did not  
26 | propose any revenue imputations due to her recommendation. The proper remedy is retention  
27 | of dual rate structure that exists today until cost analyses of these various miscellaneous  
28 | charges are undertaken. Any rate change – whether increase or decrease – should be preceded  
29 | by an imputation calculation and a cost study.

1 **THE WRONG APPLICATION - CUSTOMERS PRESENTLY BEING**  
2 **OVERCHARGED**

3 Q. Do you dispute OPC witness Meisenheimer’s testimony relating to the  
4 disconnection/reconnection charge outlined in her rebuttal testimony for existing customers  
5 under the old Southern Missouri Natural Gas Company (“SMNG”) rates?

6 A. Yes. Witness Meisenheimer Rebuttal testimony states:

7 “For example, as the Company currently applies charges for **the**  
8 **disconnection** and reconnection of service for a residential  
9 customer during normal business hours, **the Company would charge**  
10 **a customer \$70 in the SMNG service** area and \$80 in the MGU  
11 area. **The SMNG rate of \$70** is already high, yet the Company  
12 proposes to charge that customer \$80 under a consolidated tariff.”  
13 **(Emphasis Added) (Page 51 – Lines 9 to 16)**

14 The SMNG residual tariff (P.S.C. No. 2) lacks a disconnection charge of \$40.00. A  
15 proper interpretation for a SMNG disconnection and reconnection tariffed charge is \$30, not  
16 \$70.

17 **OPC POSITION RELATING TO LOW-INCOME AND**  
18 **DISCONNECTION/RECONNECTION CHARGES**

19 Q. Does OPC Witness Meisenheimer Rebuttal testimony<sup>1</sup> contain statements that  
20 low-income customers deserve to be subsidized when it comes to disconnect and reconnect  
21 fees?

22 A. Yes. OPC witness Meisenheimer uses the term “late payment fees” in her  
23 rebuttal testimony, but it appears she is addressing the miscellaneous disconnection &  
24 reconnection fees) in her testimony. Staff does not believe “late payment fees” are an issue in  
25 the case. Nor are disconnect and reconnect fees deserving of being subsidized – resulting in  
26 others paying more.

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<sup>1</sup> Rebuttal – Page 51 – lines 1 to 21 & Page 52 – lines 1 to 15

1 **SEASONAL DISCONNECT – THE MISSING ISSUE**

2 Q. Is there any other OPC issue that Staff wants to address?

3 A. Yes. I am addressing the following statement in OPC witness Meisenheimer's  
4 Rebuttal, in which she states the following:

5 **Q. WOULD YOU ALSO OPPOSE EFFORTS TO IMPOSE A**  
6 **SEASONAL DISCONNECTION CHARGE?**

7 A. Yes. Customers should not be forced to pay for service they  
8 do not want or cannot afford. Requiring returning customers  
9 to pay seasonal disconnection charges creates an unnecessary barrier  
10 to customers joining the system. (Page 52 - lines 11 to 15)

11 Staff does not see where there was any proposal for a "Seasonal Disconnection  
12 Charge". Staff has not been able to find the proposed or current tariff relating to this issue.

13 Q Does that conclude your surrebuttal testimony?

14 A. Yes. It does.