

## Exhibit No. 102

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

Ozarks Medical Center d/b/a Ozarks Healthcare,	)	
	)	
Complainant,	)	
	)	
	)	Case No. GC-2022-0158
	)	
Summit Natural Gas of Missouri, Inc.,	)	
	)	
Respondent.	)	

**OZARK MEDICAL CENTER D/B/A OZARKS HEALTHCARE’S SECOND SET OF  
DATA REQUESTS 8-11 TO SUMMIT NATURAL GAS OF MISSOURI, INC.**

8. Paragraph 13 of SNGMO’s financing application in GF-2022-0216, dated February 16, 2022, explains that SNGMO desires to take advantage of low interest rates to “fund a portion of incurred winter storm costs.” Please identify what “incurred winter storm costs” refers to and whether OMC’s disputed cashout imbalance is included.

**Response: The “incurred winter storm costs” refer to gas cost expenses incurred during the February 2021, Winter Storm Uri, less SNGMO’s weather-normalized baseline forecast. OMC’s disputed cashout imbalance is a part of the “incurred winter storm costs” and is factored into the current Purchased Gas Adjustment for the Rogersville District.**

9. Has any public agency, private auditing firm, or credit rating entity downgraded SNGMO’s credit worthiness in response to OMC’s dispute of March 2021 cashout debt? If so, please identify the agency, private auditing firm, or credit rating entity as well as the resulting downgraded credit worthiness score.

**Response: All SNGMO debt is maintained at its parent company, Summit Utilities, Inc. Therefore, no public agency, private auditing firm, or credit rating entity has downgraded SNGMO’s credit worthiness in response to OMC’s dispute.**

10. SNGMO witness Walt McCarter explains that SNGMO is currently collecting interest on the disputed cashout imbalance through its Purchased Gas Adjustment clause on page 10, line 12-16 of his rebuttal testimony for Case No. GC-2022-0158. How does SNGMO expect to treat the

interest should the Missouri Public Service Commission grant OMC's request for an account authority order?

**Response: SNGMO has not yet considered or discussed with Staff how collected interest would be treated within the Purchased Gas Adjustment clause should the Missouri Public Service Commission grant OMC's request for an accounting authority order.**

11. Missouri Public Service Commission witness David Sommerer states on page 3, lines 17-19 of his rebuttal testimony for Case No. GC-2022-0158 that, "It is Staff's understanding that [SNGMO] has reflected the gas costs impacts of Storm Uri in the November 22, 2021, ACA filing." Please confirm whether Mr. Sommerer's understanding is accurate and whether OMC's disputed cashout imbalance is currently included in SNGMO's Purchased Gas Adjustment charges to sales customers.

**Response: OMC's disputed cashout imbalance is factored into the current Purchased Gas Adjustment rate for the Rogersville District.**

Respectfully Submitted,

*/s/ Brooke Parsons*  
Brooke Parsons  
Corporate Counsel  
Summit Natural Gas of Missouri, Inc.