

**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 Its Cost Allocation Manual)

File No. GO-2012-0322

STATUS REPORT

COME NOW the Staff of the Missouri Public Service Commission, by and through the Staff Counsel's Office, Summit Natural Gas of Missouri, Inc., ("SNGMO"), and the Office of the Public Counsel ("Public Counsel") (collectively "the Parties") and hereby file their *Status Report* pursuant to the Commission's June 15, 2020, *Order Further Staying Proceedings and Ordering Status Report*. In support thereof, the Parties state as follows:

BACKGROUND

1. On August 26, 2019, Staff and SNGMO filed a *Joint Motion to Stay Proceeding*. A procedural schedule had been set in the instant case to address a new Cost Allocation Manual ("CAM"). Staff and SNGMO proposed staying the instant proceeding because File No. AW-2018-0394 will likely result in the initiation by the Commission of a formal rulemaking under Chapter 536 RSMo regarding changes to the Affiliate Transactions Rule ("ATR"). On August 28, 2019, Public Counsel filed its Response of the Office of the Public Counsel to the Joint Motion to Stay Proceeding. With qualifications, Public Counsel did not object to a stay of the proceedings.

2. On November 6, 2019, in File No. AW-2018-0394, Staff submitted a red-lined version of its revised draft ATR with explanations for each individual change. On November 7, 2019, the Commission issued its *Order Requesting Additional Responses*, and on December 9, 2019, interested stakeholders submitted further comments.

3. On February 18, 2020, Staff filed its *Notice of Third Draft of Affiliate Transactions and HVAC Affiliate Services Rules*, in which it indicated that it believes its most recent version is ready to proceed towards the formal rulemaking process. In addition, Staff requested that the Commission issue an order or notice inviting interested stakeholders to file comments as to the costs of implementing Staff's proposed rules. The Commission did so on February 26, 2020. On March 2, 2020, the Parties filed their Status Report recommending these proceedings be stayed and the Commission issued its March 11, 2020 *Order Further Staying Proceedings and Ordering Status Report* to be filed no later than June 8, 2020. On June 8, 2020, the Parties filed their *Status Report* recommending a status report be filed no later than September 11, 2020. On June 15, 2020, the Commission issued its *Order Further Staying Proceedings and Ordering Status Report* to be filed no later than September 11, 2020.

**CURRENT STATUS & RECOMMENDATION FOR
FURTHER STAY OF PROCEEDINGS**

4. The Parties note that no further progress in the SNGMO CAM proceedings has occurred since the June 8th *Status Report*. Future progress in these CAM proceedings depend on achieving an eventual affiliate transactions rulemaking in File No. AW-2018-0394 and on the resolution of the customer information rule rulemaking in File No. AW-2018-0393. Both rulemaking cases have not progressed due to the pandemic emergency. Therefore, the Parties recommend the Commission continue its stay of the above-captioned SNGMO CAM proceedings. Staff and SNGMO point out to the Commission that SNGMO is not currently conducting affiliate transactions that would impact the company's Purchased Gas Adjustment (PGA) or its Actual Cost Adjustment (ACA).

WHEREFORE Staff, SNGMO, and Public Counsel pray the Commission will accept their September 11, 2020, Status Report and direct the parties to file another status report no later than December 11, 2020.

Respectfully submitted,

/s/ Robert S. Berlin

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**Attorney for the
Office of the Public Counsel**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile, or electronically mailed to all counsel of record this 11th day of September 2020.

/s/ Robert S. Berlin