

In the Matter of the Application of)
Summit Natural Gas of Missouri, Inc.)
for Approval of its Cost Allocation Manual)

Case No. GO-2012-0322

STATUS REPORT

COME NOW the Staff of the Missouri Public Service Commission, by and through the Staff Counsel's Office, and on behalf of all the parties herein, hereby files its *Status Report* pursuant to the Commission's April 13, 2023, *Order Further Staying Proceedings and Ordering Status Report*. In support thereof, Staff states as follows:

Background:

1. On August 26, 2019, Staff and Summit Natural Gas of Missouri (“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 Case 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 (“OPC”) filed its *Response of the Office of the Public Counsel to the Joint Motion to Stay Proceeding*. With qualifications, OPC did not object to a stay of the proceedings.

2. On November 6, 2019, in Case 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. Since then, the Parties have filed status reports on March 2, 2020, June 8, 2020, September 11, 2020, December 11, 2020, March 12, 2021, July 12, 2021, October 12, 2021, January 12, 2022, and April 12, 2023. On April 13, 2023, the Commission issued its *Order Further Staying Proceedings and Ordering Status Report* to be filed no later than April 12, 2024.

Current Status & Recommendation for Further Stay of Proceedings:

4. Staff notes that no further progress in the SNGMO CAM proceedings has occurred since the last *Status Report*. Future progress in these CAM proceedings depends on achieving an eventual affiliate transactions rulemaking in Case No. AW-2018-0394 and on the resolution of the customer information rule rulemaking in Case No. AW-2018-0393. Neither of these rulemaking cases has progressed since the *Status Report* filed herein one year ago. Therefore, Staff recommends the Commission continue its stay of the above-captioned SNGMO CAM proceedings.

5. Perhaps more importantly, Staff points 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 prays the Commission will accept its April 12, 2024, *Status Report* and direct that another status report be filed no later than April 12, 2025, unless a material change of circumstances occurs sooner.

Respectfully submitted,

/s/ J. Scott Stacey

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**ATTORNEY FOR STAFF OF THE
PUBLIC SERVICE COMMISSION**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing has been served, by hand delivery, electronic mail, or First Class United States Mail, postage prepaid, to all parties of record on the Service List maintained for this case by the Data Center of the Missouri Public Service Commission, on this **7th day of April, 2024**.

/s/ J. Scott Stacey