

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

In the Matter of the Establishment of a Working Case for the Review and Consideration of Amending the Commission's Natural Gas Safety Rules. ) ) File No. GW-2023-0272 ) )

**SUMMIT NATURAL GAS OF MISSOURI'S INITIAL COMMENTS**

COMES NOW Summit Natural Gas of Missouri (“Company” or “SNGMO”), and in response to the Missouri Public Service Commission's ("Commission") *Order Opening a Working Case to Consider Amending the Commission's Natural Gas Safety Rules* issued on March 8, 2023, SNGMO states as follows:

1. The Company has had the opportunity to review Staff’s proposed amendments to the Commission’s gas safety rules and has no concerns with Attachments A and C to Staff’s Motion.

2. SNGMO does have several concerns regarding the proposed amendments made to Attachment B, Part 2 of Staff’s Motion. These same concerns are reflected in the comments submitted by Ameren Missouri, including concerns with certain proposed revisions to 20 CSR 4240-40.020(4)(A)(1) — specifically, 20 CSR 4240-40.020(4)(A)(1)B, D, E, F and G. SNGMO agrees with Ameren Missouri that the proposed changes include terms that are not well defined, and ambiguous which makes it difficult for operators to identify what constitutes a Missouri-reportable event.

3. SNGMO agrees with and adopts the comments as stated by Ameren Missouri in its April 3, 2023 filing.

4. SNGMO supports further discussion with Staff and other stakeholders around these important gas safety rules.

WHEREFORE, SNGMO respectfully submits its Initial Comments.

Respectfully submitted,

*/s/ Goldie T. Bockstruck*

Goldie T. Bockstruck #58759

Director, Regulatory Affairs and

Regulatory Counsel

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**Attorney for Summit Natural Gas of Missouri**

Dated: April 3, 2023

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been emailed to the parties of record on this 3rd day of April, 2023.

Goldie T. Bockstruck

/s/Goldie Bockstruck