

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

In the Matter of the Application of)
Summit Natural Gas of Missouri, Inc.,)
for Waiver Concerning Commission Rule)
4 CSR 240-40.090)

Case No. GE-2020-0009

STAFF RESPONSE TO ORDER DIRECTING RESPONSES

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and for its *Response to Order Directing Responses* in this matter hereby states:

1. On July 15, 2019, Summit Natural Gas of Missouri, Inc. (“Summit”) filed an *Application for Waivers Concerning Depreciation Study and Notice* requesting a waiver of rules requiring a depreciation study, database, and property unit catalog no less than every 5 years. Staff agreed to waive the depreciation study but rejected waiving the database and property unit catalog requirements. Staff also recommended the waiver extend only up to July 1, 2029 (10 year waiver).

2. On October 3, 2019, the Office of the Public Counsel (“Public Counsel”) submitted their response to Staff’s recommendation. Public Counsel objected to Staff’s recommendation of a 10 year waiver and instead recommends no more than a five year waiver.

3. On October 9, 2019, the Commission directed Staff and Summit in its *Order Directing Responses* (“Order”) to file a response to Public Counsel’s recommendation to limit the waiver to no longer than five years. On the same day, Summit filed its response to the Commission’s Order in which Summit did not object to Public Counsel’s request for a five year waiver.

4. Staff concurs with the Public Counsel and Summit and recommends no more than a five year waiver.

WHEREFORE, Staff recommends the Commission grant Summit a five year waiver rather than the 10 year waiver detailed in Staff's *Recommendation*.

/s/ Ron Irving

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 11th day of October, 2019, to all counsel of record.

/s/ Ron Irving