

In the Matter of the Application of)
Summit Natural Gas of Missouri, Inc.) File No. GE-2020-0009
for Waiver Concerning Commission)
Rule 4 CSR 240-40.090.)

COME NOW Summit Natural Gas of Missouri, Inc. (“SNGMo” or “Company”), the Staff of the Missouri Public Service Commission (“Staff”), and the Office of the Public Counsel (“OPC”), and, for their *Response to Order Directing Response Issued October 30, 2019*, respectfully state as follows to the Missouri Public Service Commission (“Commission”).

On October 30, 2019, the Commission issued its Order Directing Response, in which the Commission directed that the parties respond to three identified questions. SNGMo provides the following responses to those questions:

Response: The requested waiver should be under 40.090(1) (which states utilities “shall submit a depreciation study” in accordance with (1)(B), as well as 40.090(1)(B)1 and 2, as SNGMo has filed a Notice of Intended Case Filing in File No. GR-2020-0069 expressing SNGMo’s “intent to file tariffs to initiate a general rate case proceeding seeking an increase in its natural gas rates within the next 60-90 days, or shortly thereafter.”

Response: No. Pursuant to condition b, SNGMo will provide a non-statistical depreciation review, database, and property unit catalog upon submission of a general rate increase

request and “a statistical depreciation study, database, and property unit catalog according to 20 CSR 4240-40.090 on or before July 01, 2024.” This constitutes a waiver from (1)(B)1 until 2024, and a time limited waiver from (1)(B)1 and (1)(B)2 as to the filing of a depreciation study (for which the non-statistical depreciation review is substituted).

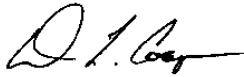
If the intent is not to waive the database and property unit catalog requirements under the every-5-year requirement of 40.090(1)(B)1, should the mention of the database and property unit catalog be deleted from condition paragraph a?

Response: See the response above.

WHEREFORE, SNGMo, Staff, and OPC prays the Commission consider this *Response to Order Directing Response Issued October 30, 2019*, and, thereafter, issue its order granting SNGMo’s Application, subject to the responses and clarification contained herein.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail to the following counsel this 1st day of November, 2019:

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