

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

In the Matter of the Application of Summit Natural Gas of Missouri, Inc. for Authority to Amend and Extend the Term of its Existing Credit Agreement, and to Extend the Term of its Outstanding Secured Indebtedness of \$100,000,000 with the Issuance of one or more New Promissory Notes )  
)  
) **Case No. GF-2018-0041**  
)

**STAFF MOTION FOR EXTENSION OF TIME TO FILE RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission and for its Motion for Extension of Time to File Recommendation (“Motion”) states as follows:

1. On October 12, 2017, Summit Natural Gas of Missouri, Inc. (“Summit” or the “Company”) filed an Application and Request for Waiver (“Application”), seeking authority to refinance \$100,000,000 of existing senior secured indebtedness.

2. At the time it filed its Application on October 12, 2017, Summit indicated that **Appendix 1** (the Secretary’s certificate evidencing Board of Directors authorization); **Appendix 2** (the Proposed Credit Agreement); **Appendix 4** (the General Security Agreement); and **Appendix 5** (the Mortgage, Security Agreement, Assignment of Profits and Proceeds, Financing Statement and Fixture Filing) to the Application were not available at the time of filing and would be late-filed when they became available.

3. As of the drafting of this Motion<sup>1</sup>, **Appendices 1, 2, 4, and 5** have not been late-filed.

4. On October 17, 2017, the Commission issued, by delegation of authority, an Order Directing Filing (“Order”) which directed Staff to file a recommendation on the Application no later than November 16, 2017.

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<sup>1</sup> Monday afternoon, November 13, 2017.

5. The Order also stated that the recommendation filing date may be extended upon the filing of a motion.

6. Given that the Appendices to Summit's Application have yet to be filed, Staff will be unable to prepare and file a recommendation on the Application by November 16, 2017. Furthermore, Staff does not know when Summit will late-file the Appendices.

7. At this time Staff anticipates that it will be able to prepare and file a recommendation in this matter no later than December 11, 2017, assuming that Summit late-files **Appendices 1, 2, 4, and 5** soon. If Summit does not, Staff will seek a further extension.

**WHEREFORE**, Staff moves the Commission issue an order granting Staff until December 11, 2017, to file a recommendation on Summit's Application in this matter.

Respectfully submitted,

**/s/ Jeffrey A. Keevil**

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Attorney for the Staff of the  
Missouri Public Service  
Commission

### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record this 14<sup>th</sup> day of November, 2017.

**/s/ Jeffrey A. Keevil**