

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

In the matter of the Application of Summit)
Natural Gas of Missouri, Inc. (SNGMO) for)
Authority for Summit LDC Holdings, LLC to) **File No. GF-2022-0216**
Pledge SNGMO's Capital Stock As Security)
in Regard to Certain Indebtedness.)

RESPONSE TO STAFF RECOMMENDATION

COMES NOW Summit Natural Gas of Missouri, Inc. ("SNGMO"), and, for its *Response to Staff Recommendation*, states to the Missouri Public Service Commission ("Commission") as follows:

1. On February 16, 2022, SNGMO filed its *Application, Motion for Waiver of Notice, and Motion for Expedited Treatment*. SNGMO requested the Commission grant Summit LDC Holdings, LLC authority to enter into additional indebtedness secured by its pledge of the capital stock of its subsidiaries, including SNGMO. SNGMO also requested expedited treatment as the existing revolving credit facility matures on May 8, 2022.

2. On March 8, 2022, the Commission issued its *Order Directing Staff To File A Recommendation And Setting A Time For Responses* ("Order"). The Commission directed Staff to file a recommendation no later than April 8, 2022, and the parties to file any responses to Staff's recommendation no later than April 12, 2022.

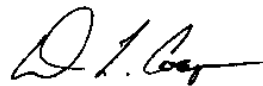
3. On April 7, 2022, Staff filed its *Staff Recommendation* and supporting *Memorandum* and recommended the Commission approve SNGMO's application and waiver of notice and grant Summit LDC Holdings, LLC authority to enter into additional indebtedness secured by its pledge of the capital stock of its subsidiaries, including SNGMO, subject to the three (3) conditions described in the Staff *Memorandum*.

4. SNGMO hereby states that it does not object to the three (3) conditions listed on page five (5) of Staff's *Memorandum*.

5. Further, the Commission's *Order* also recognized SNGMO's request for expedited treatment. SNGMO requests the Commission consider an Order approving the *Application, Motion for Waiver of Notice, and Motion for Expedited Treatment* at its April 21, 2022 agenda meeting. As stated in the Application, the existing revolving credit facility matures on May 8, 2022, and SNGMO has a proposed transaction date of May 6, 2022. Having an order that is effective on or before May 6, 2022, will assist in ensuring that there is no gap in financing.

WHEREFORE, SNGMO provides this *Response to Staff Recommendation* and requests the Commission issue an Order with an effective date on or before May 6, 2022 that: grants SNGMO's request for expedited treatment; approves SNGMO's Application and authorizes Summit Holdings to enter into indebtedness described in the Application and secured by the pledge of the capital stock of SNGMO, subject to Staff's conditions as described herein; waives the requirement of a sixty (60) day notice of intent to file as set forth in 20 CSR 4240-4.017(1) for good cause shown; and grants such other relief as may be necessary or appropriate in the circumstances.

Respectfully submitted,



Dean L. Cooper, MBE #36592

BRYDON, SWEARENGEN & ENGLAND P.C.

312 East Capitol Avenue

P.O. Box 456

Jefferson City, MO 65102-0456

(573) 635-7166 Telephone

(573) 635-0427 Facsimile

dcooper@brydonlaw.com

**ATTORNEYS FOR SUMMIT NATURAL GAS
OF MISSOURI, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing was electronically transmitted on this 11th day of April 2022 to all counsel of record.