

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

In the Matter of the Application of	)	
Summit Natural Gas of Missouri, Inc. for	)	Case No. GE-2014-0010
Waiver Concerning Commission Rule 4	)	
CSR 240-3.235.	)	

**PUBLIC COUNSEL’S RESPONSE IN  
SUPPORT OF THE STAFF RECOMMENDATION**

**COMES NOW** the Missouri Office of the Public Counsel (OPC) and for its Response in Support of the Staff Recommendation states:

1. On July 9, 2013, Summit Natural Gas of Missouri, Inc.’s (SNG) filed a petition for a waiver of Commission rule 4 CSR 240-3.235 regarding the requirement that SNG submit a depreciation study with its next rate case.

2. On August 21, 2013, the Commission’s Staff filed its Recommendation regarding SNG’s petition and recommended:

...the Commission grant SNG a partial waiver of 4 CSR 240-3.235 to allow SNG in its upcoming rate case to submit a depreciation study using a database without annual dollar retirements by vintage year and year retired. Staff supports granting SNG this partial waiver only for the next rate case filed by SNG in calendar year 2013 or 2014.

...Staff recommends the Commission order SNG to comply with the other requirements of 4 CSR 240-3.235, including the requirements that with its next rate case SNG submit a property unit catalog, reserves for depreciation, surviving plant balance, and estimated final retirement date and surviving dollar investment for each major facility or general office building. Staff found no good cause for the Commission to waive SNG’s other filing obligations under the rule for its next rate case

3. Public Counsel supports these recommendations and urges the Commission to issue an order consistent with the Staff Recommendation.

WHEREFORE, the Office of the Public Counsel respectfully submits this response to the Staff Recommendation.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 22<sup>nd</sup> day of August 2013:

/s/ Marc Poston