

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

In the Matter of the Application of Summit )  
Natural Gas of Missouri, Inc., for a Variance )  
From the Provisions of Commission Rule ) **File No. GE-2018-0193**  
20 CSR 4240-10.030(19) )

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

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

1. On November 22, 2022, Summit Natural Gas of Missouri, Inc. (hereafter “SNGMO” or “the Company”) filed its *Third Motion for Variance* (“*Motion for Variance*”) from the Commission’s September 5, 2018 *Order Approving Stipulation and Agreement* (“*Order*”) relating to the Company’s Meter Sampling Test Program.

2. On November 28, 2022, the Commission issued an *Order Directing Filing*, which requires Staff to file a recommendation regarding the Company’s request for a variance no later than December 28, 2022.

3. The Commission’s *Order* approved SNGMO’s Meter Test Program to test a sampling of the Company’s meters over a period of four years, from January 2019 through December 31, 2022. SNGMO’s *Motion for Variance* asks for an extension of the sampling period to extend another three years, until December 31, 2025. SNGMO filed its Motion a little over one month before the test period was to expire, putting Staff in an untenable position of making a fully-informed recommendation just prior to the test program ending.

4. Staff cannot make any recommendations on whether the Company should be granted a third variance, extending the test period for any length of time, without having

time to submit data requests (DRs), receive responses, and determine if the information is sufficient to make a recommendation.

5. Staff has issued DRs to aid in its review of SNGMO's variance request and make its recommendations; however, those responses will not be due until after its recommendation is currently due to the Commission.

6. On December 5, 2022, the Office of the Public Counsel ("OPC") submitted 11 DRs to SNGMO. The Company has until December 25, 2022, to respond to those DRs, three days prior to the date Staff's recommendation in this matter is due to be filed.

7. In order to provide sufficient time to conduct further discovery, analyze data and information from the Company, and complete its investigation, Staff requests an additional 30 days in which to complete and file its recommendation. That being said, Staff will endeavor to complete its review prior to any newly-established filing date.

8. Counsel for SNGMO and OPC have been contacted regarding this motion and neither party objects to the granting of an extension of time in this matter.

9. This Motion is made in the interest of justice and without the intent to unreasonably delay or hinder these proceedings in any manner.

**WHEREFORE**, Staff respectfully submits this *Motion for Extension of Time to File Staff Recommendation* for the Commission's information and consideration and hereby prays the Commission grant Staff an additional 30 days within which to file its recommendation in this matter; and to grant such other and further relief as the Commission considers just and reasonable in the circumstances.

Respectfully submitted,

**/s/ Carolyn H. Kerr**

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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 19<sup>th</sup> day of December, 2022, to all counsel of record.

**/s/ Carolyn H. Kerr**