

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

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| In the Matter of |) | |
| Summit Natural Gas of Missouri Inc.'s |) | <u>File No. GR-2014-0086</u> |
| Filing of Revised Tariffs to Increase Its |) | Tracking No. YG-2014-0285 |
| Annual Revenues for Natural Gas Service |) | |

STAFF STATEMENT DESCRIBING DISCOVERY CONCERN

COMES NOW the Staff (Staff) of the Missouri Public Service Commission (Commission), by and through counsel, and respectfully submits the following statement of discovery concerns pursuant to Section 6(B) of the Procedural Schedule in this case:

1. On February 26, 2014, the Commission issued its *Order Setting Procedural Schedule and Terms of Discovery*, which adopted the *Joint Proposed Procedural Schedule and Discovery Order*.

2. Paragraph 6(B) of the *Procedural Schedule* provides:

Not less than two (2) business days before each discovery conference, any party that has a discovery disagreement or concern involving another party shall file a brief statement describing that disagreement or concern and identifying any other parties involved. Such statement does not need to be a formal motion to compel.

3. The next such discovery conference in this matter is scheduled for Tuesday, July 15, 2014.

4. On June 19¹, the Commission granted Staff's Motion to Compel certain financial data related to SNG's parent company and the parent company's sole shareholder. On June 25, the Commission extended SNG's time to provide the data to July 2. On July 7, the Commission denied SNG's motion for reconsideration of the order granting the motion to compel.

¹ All dates are in 2014.

5. As of the date of this filing, Staff has not received the data from SNG that the Commission ordered SNG to produce.

6. Staff has been in discussions with SNG about provision of the data. Therefore Staff requests that the Commission convene the discovery conference as scheduled on Wednesday, July 15, in order to discuss with SNG and the Commission a timetable for SNG to provide this data.

7. Further, the discovery conference will be an opportunity for Staff to discuss SNG's June 16 objection letter related to Staff's data request 0217.²

WHEREFORE, Staff respectfully requests the Commission issue an order convening the discovery conference scheduled in this matter for 10 a.m. on Tuesday, July 15, 2014.

Respectfully Submitted,

/s/ John D. Borgmeyer

John D. Borgmeyer
Deputy Legal Counsel
Missouri Bar No. 61992
Attorney for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102
Telephone: (573) 751-5472
Fax: (573) 751-9285
Email: john.borgmeyer@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 10th day of July, 2014.

/s/ John D. Borgmeyer

² On July 10, the Commission granted Staff until July 17 to file a motion to compel related to this objection.