

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

Missouri Propane Gas Association,)	
)	
Complainant,)	
)	
v.)	Case No. GC-2016-0083
)	
Summit Natural Gas of Missouri, Inc.,)	
)	
Respondent.)	

**SUMMIT NATURAL GAS OF MISSOURI, INC.’S RESPONSE IN OPPOSITION TO
MPGA’S MOTION FOR A PROCEDURAL CONFERENCE**

COMES NOW Summit Natural Gas of Missouri, Inc. (“Summit”) and for its Response in Opposition to the Missouri Propane Gas Association’s (MPGA) Motion for A Procedural Conference states as follows:

1. On August 24, 2017, MPGA filed a motion asking the Commission to schedule a procedural conference. MPGA states that the conference would be intended to accomplish two goals: 1) to establish a procedural schedule to address pending motions; and 2) to set the matter for evidentiary hearing. Summit submits that a procedural schedule is unnecessary to address the pending motions, and that it is premature to schedule an evidentiary hearing.

2. As MPGA points out, several rounds of responses and counter-responses have been filed on the pending motions. The questions concerning summary disposition and supplemental testimony are squarely before the Commission to decide as and when it sees fit. A procedural conference would do nothing to advance them.

3. In its pleadings, Summit has requested that the Commission deny MPGA’s untimely request to re-do its case-in-chief to attempt to avoid summary determination. And,

whether or not MPGA's motion is granted, Summit's motion for summary determination would if granted result in a dismissal of MPGA's complaint which would render a procedural conference or an evidentiary hearing a nullity.

4. In light of Summit's pending dispositive motion, the conference MPGA request would waste judicial resources and would also be an unnecessary use of the parties' resources. The procedural posture of this case as it stands is appropriate.

WHEREFORE, Summit respectfully requests that the Commission deny MPGA's motion to schedule a procedural conference.

Respectfully Submitted,

By: /s/ Lewis Mills

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**ATTORNEY FOR SUMMIT NATURAL
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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed to all parties of record this ____ day of August, 2017.

/s/ Lewis Mills

Lewis Mills