

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

In the Matter of the Application of)	
Summit Natural Gas of Missouri, Inc.)	
for Waiver Concerning Commission)	File No. GE-2020-0009
Rule 4 CSR 240-3.235 and)	
Rule 4 CSR 240-3.275.)	

**MOTION FOR LEAVE TO AMEND APPLICATION
AND CASE CAPTION**

COMES NOW Summit Natural Gas of Missouri, Inc. (“SNGMo” or “Company”), and, for its *Motion for Leave to Amend Application and Case Caption*, respectfully states as follows to the Missouri Public Service Commission (“Commission”).

BACKGROUND

1. On July 15, 2019, SNGMo filed its *Application for Waivers Concerning Depreciation Study and Notice* (“Application”). The Commission subsequently issued its *Order Directing Notice, and Setting Dates for Intervention Requests and Staff Recommendation*, on July 18, 2019.

2. The Application, among other things, requested waivers from Commission Rules 4 CSR 240-3.235 and Rule 4 CSR 240-3.275, which require companies to submit a depreciation study, database, and property unit catalog no less often than every 5 years.

COMMISSION RULE 4 CSR 240-40.090

3. Commission Rules 4 CSR 240-3.235 and Rule 4 CSR 240-3.275 were rescinded effective July 30, 2019, and consolidated in Commission Rule 4 CSR 240-40.090, which became effective July 30, 2019. Commission Rule 4 CSR 240-40.090 states as follows:

(1) Each gas utility subject to the commission's jurisdiction shall submit a depreciation study, database, and property unit catalog to the manager of the commission's engineering analysis unit and to the Office of the Public Counsel, as required by the terms of subsection (l)(B).

(A) The depreciation study, database, and property unit catalog shall be compiled as follows:

1. The study shall reflect the average life and remaining life of each primary plant account or subaccount;

2. The database shall consist of dollar amounts, by plant account or subaccount, representing—

A. Annual dollar additions and dollar retirements by vintage year and year retired, beginning with the earliest year of available data;

B. Reserve for depreciation;

C. Surviving plant balance as of the study date; and

D. Estimated date of final retirement and surviving dollar investment for each warehouse, propane/air production facility, liquefied natural gas facility, underground natural gas storage facility, general office building, or other large structure; and

3. The property unit catalog shall contain a description of each retirement unit used by the utility.

(B) A gas utility shall submit its depreciation study, database, and property unit catalog on the following occasions:

1. Upon the date five (5) years from the last time the commission's staff received a depreciation study, database, and property unit catalog from the utility; and

2. Upon submission of a general rate increase request. However, a gas utility need not submit a depreciation study, database, or property unit catalog to the extent that the commission's staff received these items from the utility during the three (3) years prior to the utility's filing for a general rate increase request.

6. The provisions of Commission Rule 4 CSR 240-40.090 are substantively the same as those of Commission Rules 4 CSR 240-3.235 and Rule 4 CSR 240-3.275, from which SNGMo sought waivers. With the change in the Commission rules, SNGMo now seeks a waiver from Commission Rule 4 CSR 240-40.090, for the same reasons as those stated in its Application.

LEAVE TO AMEND

7. Accordingly, SNGMo seeks leave to amend its Application to reflect that SNGMo seeks a waiver from Commission Rule 4 CSR 240-40.090. A grant of the leave requested will allow this matter to move forward on the timeline previously established by Commission order without prejudice to any party.

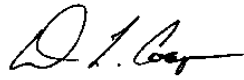
CASE CAPTION

8. Further, if leave to amend the Application is granted, SNGMo asks that the caption of this case be amended to read as follows:

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Summit Natural Gas of Missouri, Inc.)	File No. GE-2020-0009
for Waiver Concerning Commission)	
Rule 4 CSR 240-40.090.)	

WHEREFORE, SNGMo respectfully moves Commission for leave to amend its Application and the caption of this case as described herein.

Respectfully submitted,



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ATTORNEYS FOR SUMMIT NATURAL
GAS OF MISSOURI, INC.

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail to the following counsel this 31st day of July, 2019:

General Counsel's Office
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Office of the Public Counsel
opcservice@ded.mo.gov

