

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

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

RESPONSE TO STAFF RECOMMENDATION

COMES NOW Summit Natural Gas of Missouri, Inc. (“SNGMo” or “Company”), and, for its *Response to Staff Recommendation*, respectfully states as follows to the Missouri Public Service Commission (“Commission”).

1. On September 16, 2019, the Staff of the Commission (“Staff”) filed a Staff Recommendation and an associated Memorandum, wherein it suggested that the “lack of historical plant retirement data is good cause to grant a temporary waiver of Commission Rule 20 CSR 4240-40.090(1)(A)1 requiring the average and remaining life of each primary plant account or subaccount” and further suggested that “good cause does not exist to waive the database and property unit catalog requirements of Commission Rule 20 CSR 4240-40.090(1)(A)2 and Commission Rule 20 CSR 4240-40.090(1)(A)3 respectively.”

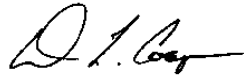
2. The Memorandum further identified that the suggested waiver should be for the time period up to July 1, 2019, and identified conditions a-e. (Memo, p. 5-6)

3. SNGMo has no objection to the Staff Recommendation, to include conditions a-e.

WHEREFORE, SNGMo prays the Commission consider this *Response to Staff Recommendation* and, thereafter, issue its order granting SNGMo’s Application, subject to

the conditions outlined in the Staff Recommendation.

Respectfully submitted,



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ATTORNEYS FOR SUMMIT NATURAL
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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 26th day of September, 2019:

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