

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

In the matter of the Application of Summit Natural Gas of Missouri, Inc. (SNGMO) for Authority for Summit LDC Holdings, LLC to Pledge SNGMO's Capital Stock as Security in Regard to Certain Indebtedness.)
)
) File No. GO-2021-0257
)
)

**RESPONSE TO STAFF RECOMMENDATION
AND AGREEMENT WITH ADDITIONAL CONDITIONS**

COMES NOW Summit Natural Gas of Missouri, Inc. ("SNGMO") and, as its *Response to Staff Recommendation and Agreement with Additional Conditions*, states as follows to the Missouri Public Service Commission ("Commission"):

BACKGROUND

1. On March 12, 2021, the Staff of the Commission ("Staff") filed its *Staff Recommendation*. On March 26, 2021, SNGMO filed a *Motion for Extension*, with the agreement of the Staff and Office of the Public Counsel ("OPC") requesting that parties be permitted until April 9, 2021, to respond to the Staff Recommendation. The Commission's Order Granting Extension issued March 29, 2021, granted that request.

2. Discussions have since continued and, as a result of those discussions, SNGMO is herein providing additional detail as to the use of funds associated with the Application and agreement with certain additional conditions proposed by the OPC.

3. The subject indebtedness will be used as follows:

- a. **\$__**: Repayment of Revolving Credit Facility; and,
- b. The remainder will be used for working capital needs and Capital expenditures across all Summit LDC Holdings, LLC companies.

4. The current 2021 capital expenditure budget for the Summit LDC Holdings, LLC

companies is as follows:

CNG	** \$. **
SNGMO	** \$. **
AOG	** \$. **
TOTAL	** \$. **

CONDITIONS

5. SNGMO has reviewed Staff Recommendation and has no objection to the Commission approving the Application subject to the conditions requested by Staff.

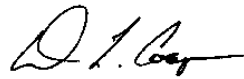
6. Additionally, OPC has proposed to SNGMO the following conditions with which SNGMO also has no objection:

- a. That the proceeds from the up to \$100 million of debt authority shall be used for Summit LDC Holdings, LLC's investment in the following subsidiaries: Summit Natural Gas of Missouri, Colorado Natural Gas Company and AOG Corporation.
- b. That within 30 days of the issuance of debt pursuant to the Commission's Authority, SNGMO shall file the final terms and conditions of any debt issued pursuant to the Commission's Authority.
- c. That within 60 days of the closing of the calendar quarter in which Summit LDC Holdings, LLC issued the authorized debt, SNGMO shall file evidence that Summit LDC Holdings, LLC used the proceeds from the debt issuance as outlined in SNGMO's original application, as supplemented herein. This evidence shall include, but not be limited to the Summit LDC Holdings, LLC's quarterly financial statements (to include at least the balance sheet, income statement and statement of cash flows) for the quarter in which Summit LDC Holdings, LLC issued the debt approved pursuant to the Commission's Authority.

- d. That the Commission's Authority for the transactions requested in this Application shall terminate on December 31, 2023.
7. Counsel for Staff has indicated that Staff has no objection to the additional conditions identified herein.
8. The items identified herein as Confidential are marked as such in accordance with Commission Rule 20 CSR 4240-2.135(2)(A)(3) and (6) as they contain market specific information and information representing strategies employed in contract negotiations.

WHEREFORE, SNGMO requests that the Commission issue its order approving the Application, subject to the Staff and OPC conditions identified herein.

Respectfully submitted,



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**ATTORNEYS FOR SUMMIT NATURAL GAS
OF MISSOURI, INC.**

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 9th day of April 2021, to:

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