

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

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 MOTION FOR EXTENSION OF TIME TO FILE DISCOVERY MOTION

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Motion for Extension of Time to File Discovery Motion* hereby states:

1. On June 23, 2014, the Commission issued an order modifying the discovery procedure in this case by setting a 10-day deadline to file discovery motions.

2. On June 16,¹ Summit Natural Gas of Missouri Inc. (SNG) objected to Staff data request 0217. This data request seeks certain financial information from IIF, the sole shareholder of SNG's parent company, Summit Utilities, Inc. (SUI).

3. On July 10, the Commission granted Staff's request to extend the deadline to file a motion related to this data request until July 17, 2014.

4. Since then, SNG has provided a response to this data request. Staff has some additional questions about this response. SNG has agreed to discuss these additional questions with Staff.

5. To give the parties time to complete these discussions, Staff hereby requests that the Commission extend the time to file a discovery motion related to data request 0217 until Wednesday, July 30. SNG has indicated it does not oppose this extension of time.

¹ All dates in 2014.

6. Good cause exists for this extension because the parties are engaging in discussions that Staff hopes will resolve its discovery concerns without litigation. This extension will preserve Staff's discovery rights while at the same time conserve the parties' and the Commission's resources. Finally, this extension is still well in advance of the close of direct case discovery, which is scheduled for August 13.

WHEREFORE, Staff hereby requests the Commission grant Staff an extension of time until July 30, 2014, to file any discovery motion related to SNG's objection to Staff data request 0217.

Respectfully submitted,

/s/ John D. Borgmeyer

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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 16th day of July, 2014.

/s/ John D. Borgmeyer