

**BEFORE THE 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) **File No. GF-2022-0216**
Pledge SNGMO’s Capital Stock As Security)
in Regard to Certain Indebtedness.)

SNGMO SUPPLEMENTAL RESPONSE TO STAFF RECOMMENDATION

COMES NOW Summit Natural Gas of Missouri, Inc. (“SNGMO”), and, for its *Supplemental Response to Staff Recommendation*, states to the Missouri Public Service Commission ("Commission") as follows:

1. On February 16, 2022, SNGMO filed its *Application, Motion for Waiver of Notice, and Motion for Expedited Treatment*. On March 8, 2022, the Commission issued its *Order Directing Staff To File A Recommendation And Setting A Time For Responses* (“Order”). Among other things, the Commission directed the parties to file any responses to Staff’s recommendation no later than April 12, 2022.

2. On April 11, 2022, SNGMO filed its *Response to Staff Recommendation* and, therein, stated that it does not object to the three (3) conditions listed on page five (5) of Staff’s *Memorandum*.

3. Subsequently, SNGMO was contacted by the Office of the Public Counsel (OPC) concerning this matter. OPC has proposed to SNGMO the following conditions (OPC Conditions):

a. That the proceeds from the up to \$460 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

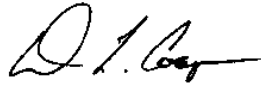
4. SNGMO has no objection to the OPC Conditions.

5. As stated in the Application and SNGMO's *Response to Staff Recommendation*, the existing revolving credit facility matures on May 8, 2022, and SNGMO has a proposed transaction date of May 6, 2022. Having an order that is effective on or before May 6, 2022, will assist in ensuring that there is no gap in financing. SNGMO requests the Commission's assistance in this regard.

WHEREFORE, SNGMO provides this *Supplemental Response to Staff Recommendation* and requests the Commission issue an Order with an effective date on or before May 6, 2022 that: grants SNGMO's request for expedited treatment; approves SNGMO's Application and authorizes Summit Holdings to enter into indebtedness described in the Application and secured by the pledge

of the capital stock of SNGMO, subject to Staff's conditions and the OPC Conditions described herein; waives the requirement of a sixty (60) day notice of intent to file as set forth in 20 CSR 4240-4.017(1) for good cause shown; and grants such other relief as may be necessary or appropriate in the circumstances.

Respectfully submitted,



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**ATTORNEYS FOR SUMMIT NATURAL GAS
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing was electronically transmitted on this 12th day of April 2022 to all counsel of record.

