

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

In the Matter of Summit Natural Gas of Missouri, Inc.)
Changes to Company's Purchased Gas Adjustment) **Case No. GR-2016-0091**
(PGA) Clause)

**STAFF REPLY TO SUMMIT'S RESPONSE
TO STAFF RECOMMENDATION AND MEMORANDUM**

COMES NOW the Staff of the Missouri Public Service Commission and replies as follows to the *Response to Staff Recommendation and Memorandum* filed herein by Summit Natural Gas of Missouri, Inc. ("Summit" or "Company"):

1. Staff filed its Actual Cost Adjustment ("ACA") Recommendation in this case concerning Summit's 2014-2015 ACA filing on December 13, 2016. In its ACA Recommendation, Staff recommended certain adjustments to the Company's filed ACA balances and also requested the Company respond to certain other recommendations and concerns.

2. Summit filed its *Response to Staff Recommendation and Memorandum* ("Response") on January 27, 2017. On January 30, 2017, the Commission issued an *Order Directing Staff Reply on Unavoidable Transportation Commodity Charges* ("Order") directing Staff to reply to Summit's Response no later than February 3, 2017.

3. As noted in the Order, Summit's Response does not fully agree with Staff's recommended adjustment regarding overrun charges. Further, while Staff's recommended adjustment for overrun charges was service area-specific, Summit's Response was not. It should also be mentioned that, as referenced above, Staff's

Recommendation included certain other recommendations and concerns in addition to the monetary adjustments noted in the Order.

4. Staff would like to have discussions and further follow-up with Summit regarding Summit's Response to Staff's Recommendation in an effort to better understand, and hopefully resolve, any remaining disagreements in this case; however, February 3 does not allow sufficient time to accomplish this. Therefore, Staff requests until March 6, 2017, to file a further reply to Summit's Response.

WHEREFORE, Staff respectfully requests that the Commission issue an order granting Staff until March 6, 2017, to file a further reply to Summit's Response in this case.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record this 3rd day of February, 2017.

/s/ Jeffrey A. Keevil