

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

In the Matter of Summit Natural Gas of Missouri Inc.'s Filing of Revised Tariffs to Increase its Annual Revenues for Natural Gas Service.)
Case No. GR-2014-0086)

**PUBLIC COUNSEL'S REPLY TO
MOTION FOR EXPEDITED TREATMENT**

COMES NOW the Missouri Office of the Public Counsel and for its Reply to the Motion for Expedited Treatment, states:

1. On October 29, 2014, the Public Service Commission issued its Report and Order ("Order") in this case. (EFIS No. 273). The Order rejected the proposed tariff filed by Summit Natural Gas of Missouri, Inc. (Summit) and directed Summit to file new tariff sheets in compliance with the Order. The Order has a proposed effective date of November 28, 2014.

2. On November 6, 2014, the Office of the Public Counsel ("Public Counsel") filed its Application for Rehearing (EFIS No. 274). The Commission has not yet ruled on OPC's application.

3. On November 14, 2014, Summit filed new tariff sheets (118 pages) with a proposed effective date of December 14, 2014. (EFIS No. 278). Summit also filed a Motion for Expedited Treatment ("Motion"), wherein Summit requested that the tariffs be allowed to go into effect on December 1, 2014. (EFIS No. 277).

4. Public utilities seeking to have a tariff become effective in less than thirty days are required to file a Motion for Expedited Treatment. 4 CSR 240-2.065(2). Public

utilities seeking expedited consideration are required to show, among other things, “the harm that will be avoided, or the benefit that will accrue, including a statement of the negative effect, or that there will be no negative effect, on the party’s customers or the general public, if the commission acts by the date desired by the party.” 4 CSR 240-2.080(14).

5. Summit’s Motion is not in compliance with the Commission’s rules because it contains no statement as to the negative effect, or that there will be no negative effect, on the party’s customers or the general public. The reason for this omission is clear – an expedited rate increase will have a negative effect on Summit’s customers. For this reason, the Commission should deny the motion for failure to comply with the Commission’s rules.

6. The Motion should also fail on its merits because the large increase granted by the Order will have a negative effect on the majority of Summit’s customers, and speeding up the effective date of the tariff will create an additional negative effect by causing the rate increase to occur earlier than necessary. The Commission’s rules make clear that expedited treatment is to be granted in limited circumstances where customers will not be negatively impacted. 4 CSR 240-2.080(14)(B). Summit’s only stated reason for expedited treatment is an unsupported claim that it is “less likely to result in billing issues,” but Summit does not identify how or why such billing issues would occur. Summit has not shown that its billing system will have any more or less difficulty making the rate change on December 1 as it would on December 14. For these reasons, Public Counsel urges the Commission to deny the Motion.

WHEREFORE, the Office of the Public Counsel respectfully submits this reply and urges the Commission to deny the Motion for Expedited Treatment.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this November 21, 2014:

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