

**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)	

RESPONSE TO COMMISSION ORDER

COMES NOW the Staff (Staff) of the Missouri Public Service Commission (Commission), by and through counsel, and on behalf of the parties in this case provides the following response to the Commission's June 16 *Order Directing Filing*:

1. The Commission ordered that Staff coordinate the parties' suggestions as to a deadline for the filing of any motion related to any discovery request or response, and file the suggestions no later than June 19, 2014.

2. The parties, other than the Office of the Public Counsel (OPC), do not oppose the following addition to the Commission's discovery order:

Any motion to compel a response to a discovery request shall be filed no later than 10 calendar days after the due date for the response to the discovery request.

3. The Office of the Public Counsel suggests that the Commission not establish a deadline based on when the answers are due. Instead, OPC proposes that the Commission set a calendar date by which all motions to compel must be filed. OPC is concerned that a deadline based on the date the answer is due would give the answering party an incentive to submit answers that are incomplete and hope that the party requesting the information will not file its motion to compel in time, therefore precluding that information from being provided. This could happen even when the hearing is months away, thereby arbitrarily precluding the discovery of relevant

evidence. In addition, OPC is concerned that the process proposed by the Commission will increase the number of motions to compel filed because the party seeking discovery will need to err on the side of filing the motion rather than giving the answering party additional time to supplement its answer.

4. As of this filing, no party has indicated opposition to OPC's proposal.

WHEREFORE, Staff, on behalf of the parties to this case, hereby submits this response to the Commission's order.

Respectfully Submitted,

**STAFF OF THE MISSOURI
PUBLIC SERVICE COMMISSION**

/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 19th day of June, 2014.

/s/ John D. Borgmeyer