

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

In the Matter of Summit Natural Gas of)
Missouri, Inc.’s Purchased Gas)
Adjustment Tariff Filing) Case No. GR-2022-0122

MOTION TO MODIFY DATA REQUEST RESPONSE TIMES

COMES NOW Summit Natural Gas of Missouri, Inc. (“SNGMO”), and, as its *Motion to Modify Data Request Response Times*, states as follows to the Missouri Public Service Commission (“Commission”):

1. On November 4, 2021, SNGMO filed proposed tariff sheets to reflect changes in its Regular Purchased Gas Adjustment (PGA) factor as a result of estimated changes in the cost of natural gas. After objections by the Staff of the Commission (“Staff”), the Commission rejected those tariff sheets because they included carrying costs at a greater cost than set out in SNGMO’s PGA tariff. The Commission authorized SNGMO to refile PGA tariff sheets without the disputed carrying costs and required Staff and SNGMO to file a proposed procedural schedule to resolve the carrying cost issue.

2. SNGMo and Staff filed a joint motion on December 1, 2021, asking the Commission to adopt a procedural schedule. The Commission adopted a procedural schedule in its Order issued December 8, 2021. At the request of the parties, the Procedural Schedule included the shortening of data request response times associated with the carrying cost issue.

3. On July 22, 2022, the parties filed a *Unanimous Stipulation and Agreement* that purports to settle the carrying cost issue.

4. Separate from the carrying cost issue, Staff has been directed by the Commission to submit the results of its ACA review on or before December 15, 2022. Staff is in the process of propounding data requests related to this ACA review. Because there is no procedural schedule

in place in regard to that review, SNGMO asks that the period for responding to data requests in this case be ordered to be consistent with that found in Commission Rule 20 CSR 4240-2.090.

5. If the Commission grants this relief, it is acknowledged that as the case proceeds any party may later request that the Commission again shorten the time period to respond to data requests in this case.

6. Counsel for the Staff of the Commission and the Office of the Public Counsel (“OPC”) have stated that Staff and OPC, respectively, have no objection to this Motion.

WHEREFORE, SNGMO respectfully requests that the Commission grant this *Motion to Modify Data Request Response Times* and modify the period for responding to data requests in this case to be consistent with that found in Commission Rule 20 CSR 4240-2.090.

Respectfully submitted,

BRYDON, SWEARENGEN & ENGLAND P.C.

/s/ Dean L. Cooper _____

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**ATTORNEYS FOR SUMMIT NATURAL GAS
OF MISSOURI, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served electronically on all counsel of record on this 17th day of August, 2022.

/s/ Dean L. Cooper