

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

Ozarks Medical Center d/b/a Ozarks Healthcare,	)	
	)	
Complainant,	)	
	)	
v.	)	Case No. GC-2022-0158
	)	
Summit Natural Gas of Missouri, Inc.,	)	
	)	
Respondent.	)	

**JOINT PROPOSED REVISED PROCEDURAL SCHEDULE AND DISCOVERY PROCEDURES**

COME NOW Ozarks Medical Center d/b/a Ozarks Healthcare (“OMC”), Summit Natural Gas of Missouri, Inc. (“SNGMO”), the Staff of the Public Service Commission (“Staff”), and the Office of the Public Counsel (“OPC”), collectively the “Parties,” and provide their Joint Revised Proposed Procedural Schedule as follows:

Discovery Procedures

1. All Parties shall provide copies of affidavits, schedules, exhibits, and pleadings to other counsel of record by electronic means and in electronic format, concurrently with the filing of such affidavits, schedules, exhibits, or pleadings where the information is available in electronic format. Parties shall not be required to convert information that does not exist in electronic format to electronic format for purposes of exchanging it.
2. The Parties agree as follows regarding data requests:
  - a. Beginning February 7, 2022, the response time for all data requests shall be fourteen (14) calendar days, and the responder will have ten (10) calendar days to object or to notify the requesting party that more than fourteen (14) calendar days will be needed to provide the requested information.

- b. After February 24, 2022, the response time for data requests shall be five (5) business days to provide the requested information, and the responder will have three (3) business days to object or to notify the requesting party that more than five (5) business days will be needed to provide the requested information.
3. The Parties agree to the following regarding the scheduled Discovery Conference:
  - a. the Discovery Conference will either be held in Room 305 of the Public Service Commission's ("Commission") offices at the Governor's Office Building, 200 Madison Street, Jefferson City, Missouri or conducted remotely, at the discretion of the Regulatory Law Judge.
  - b. Not less than three (3) business days before the scheduled Discovery Conference, any party with a discovery disagreement or concern shall file a brief statement describing that disagreement or concern and identifying any other party involved. Such statement does not need to be a formal motion to compel. If no party files a brief statement of discovery disagreement or concern, then the Regulatory Law Judge may cancel the scheduled Discovery Conference.
  - c. Any party may attend a discovery conference, but only those parties involved in an identified discovery disagreement are required to attend.
  - d. Discovery conferences shall be on the record and shall be transcribed by a court reporter.
  - e. Any pending written discovery motion may be taken up at a discovery conference and may be ruled upon by the presiding regulatory law judge, either on the record, or in a written order.

- f. Commission Rule 20 CSR 4240-2.090's requirement that a party must seek a telephone conference with the presiding officer before filing a discovery motion is waived.
- g. The Parties shall make an effort to not include confidential information in data request questions, and the Parties shall make an effort not to over-designate information as confidential. If confidential information must be included in data request questions, the confidential information should be appropriately designated as such pursuant to 20 CSR 4240-2.135. Responsibility to make this designation rests upon the Party claiming such. Other Parties are entitled to rely on the presence or absence of such designation.
- h. Any data requests issued by or to Staff shall be submitted and responded to through the Commission's Electronic Filing and Information System ("EFIS"). All data requests other than those issued by or to Staff, as well as all objections to data requests, or notifications of the need for additional time to respond, shall be sent by e-mail to counsel for the other Parties. Counsel may designate other counsel to be added to the certified service list and shall assume responsibility for compliance with any restrictions regarding confidentiality. If any party responds to a data request through EFIS, the response is available through EFIS to all counsel on the certified service list. Data request responses, other than responses to data requests issued by or to Staff, will be served on counsel for the requesting Party's employee or representative who submitted the data request and shall be served electronically, if feasible, and not voluminous as defined by Commission rule. A party desiring the response to a data request that has been served on another shall submit a separate

data request for a copy of the response, thereby providing the responding Party the opportunity to object.

Proposed Procedural Schedule

4. The Parties recognize that there are few factual disputes amongst the Parties, and that no existing dispute of fact would prevent the Commission from judging OMC's Complaint based on briefing and a supporting factual record. The Parties offer a hearing date below should the Commission wish to hear from the Parties before briefing.

5. The Parties therefore recommend that the Commission adopt the following Procedural Schedule:

<b><u>Item</u></b>	<b><u>Date</u></b>
Discovery Conference	March 7, 2022
Settlement Conference	March 9, 2022
Joint Filing of Stipulation of Facts	March 16, 2022
OMC Supporting Affidavit(s)	March 16, 2022
SNGMO, Staff, and OPC Responsive Affidavit(s)	March 30, 2022
OMC Sur-Responsive Affidavit	April 8, 2022
Final Day to Serve Discovery Requests	April 14, 2022
Joint Filing of List of Issues	May 13, 2022
Statements of Position	May 18, 2022
Evidentiary Hearing	May 24, 2022
Filing of Initial Briefs	June 10, 2022
Filing of Reply Briefs	June 20, 2022
Requested Commission Order	July 18, 2022

**Wherefore**, the Parties submit their Jointly Proposed Revised Procedural Schedule and Discovery Procedures.

Respectively submitted,

**STINSON LLP**

*/s/ Caleb Hall*

---

Caleb Hall, #68112  
Charles Hatfield, #40363  
230 West McCarty Street  
Jefferson City, MO 65101  
caleb.hall@stinson.com  
chuck.hatfield@stinson.com

**ATTORNEYS  
FOR COMPLAINANT**

**BRYDON, SWEARENGEN &  
ENGLAND P.C.**

*/s/ Dean L. Cooper*

---

Dean L. Cooper #36592  
Jesse W. Craig #71850  
312 East Capitol Avenue  
P.O. Box 456  
Jefferson City, MO 65102  
Telephone: (573) 635-7166  
E-mail: dcooper@BrydonLaw.com

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

/s/ Jamie S. Myers

Jamie S. Myers  
Deputy Counsel  
Missouri Bar No. 68291  
Attorney for the Staff of the  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Mo 65102  
(573) 526-6036 (Telephone)  
(573) 751-9285 (Facsimile)  
(Email) jamie.myers@psc.mo.gov

**ATTORNEY FOR STAFF OF  
THE PUBLIC SERVICE  
COMMISSION**

/s/ Marc Poston

Marc Poston (Mo Bar #45722)  
Missouri Office of Public Counsel  
P. O. Box 2230  
Jefferson City MO 65102  
(573) 751-5318  
(573) 751-5562 FAX  
marc.poston@opc.mo.gov

**ATTORNEY FOR MISSOURI  
OFFICE OF THE PUBLIC  
COUNSEL**

**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 February, 2022.

/s/ Caleb Hall