

**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)	

STAFF MOTION FOR EXTENSION OF TIME TO FILE DISCOVERY MOTION

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Motion for Extension of Time to File Discovery Motion* hereby states:

1. On June 23, 2014, the Commission issued an order modifying the discovery procedure in this case by setting a 10-day deadline to file discovery motions. Staff is seeking an extension of time for this deadline.

2. On June 16, Summit Natural Gas of Missouri Inc. (SNG) submitted the attached objection to Staff data request 0217. This data request seeks additional financial information from IIF, the sole shareholder of SNG's parent company, Summit Utilities, Inc. (SUI). Staff is requesting that the deadline to file a motion to compel a response to this data request be extended until July 17, 2014.

3. Good cause for this extension exists because the parties recently completed productive discussions during a settlement conference held earlier this week. The Commission has also ordered SNG to produce certain financial information related to SUI and IIF by July 2, 2014. Instead of litigating data request 0217 at this time, it may be more productive for the parties to work toward resolving issues discussed during the settlement conference, and, to that end, for SNG to work on producing the information that the Commission has ordered it to provide for Staff by July 2.

4. An extension of time until July 17 will allow SNG time to comply with the Commission's order, and for Staff to analyze the information it receives from SNG. It will allow time for Staff to address, if necessary, any additional concerns about the information with SNG and with the Commission at the next discovery conference scheduled for July 15. Also, July 17 is still nearly a month before the close of direct case discovery on August 13.

5. An extension of time will preserve Staff's right to seek timely Commission enforcement of its discovery request, while also making efficient use of both SNG's and the Commission's resources.

WHEREFORE, Staff hereby requests the Commission grant Staff an extension of time until July 17, 2014, to file any discovery motion related to SNG's objection to Staff data request 0217.

Respectfully Submitted,

/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 26th day of June, 2014.

/s/ John D. Borgmeyer

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June 16, 2014

VIA ELECTRONIC MAIL

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RE: GR-2014-0086 – Summit Natural Gas of Missouri, Inc.

Dear John:

Summit Natural Gas of Missouri, Inc. (SNGMO or Company) is in receipt of Commission Staff data request (DR) 0217, received on June 10, 2014. This letter is intended to be an objection to Staff DR 0217, in accordance with Commission Rule 4 CSR 240-2.090(2).

DR 0217 -- DR 0217 requests that the Company “[f]or the period January 1, 2007 through current,” “provide IIF’s prospectus, annual investment performance reports, quarterly investment performance reports and any other investment materials it provided to current and potential investors.”

SNGMO objects to this data request as it requests information concerning an entity other than SNGMO and the information requested is not in the possession, custody or control of SNGMO. Further, SNGMO objects to this data request because the responsive information is neither relevant to the subject proceeding nor reasonably calculated to lead to the discovery of admissible evidence in that only SNGMO is regulated by the Missouri Public Service Commission.

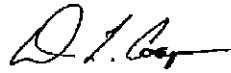
Mr. John Borgmeyer
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If you have any questions or would like to discuss this, please contact me.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:



Dean L. Cooper

Cc: Martha Wankum
Counsel for Parties to GR-2014-0086