BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of Summit Natural Gas of Missouri, Inc., Changes to Company's Purchased Gas Adjustment "PGA" Clause

File No. GR-2020-0123

SECOND MOTION FOR EXTENSION

COMES NOW Summit Natural Gas of Missouri, Inc. ("SNGMO" or "Company"), and, as its *Second Motion for Extension*, states as follows to the Missouri Public Service Commission ("Commission"):

1. On December 15, 2020, the Staff of the Commission ("Staff") filed its *Staff Recommendation Regarding Summit's 2018-2019 Actual Cost Adjustment Filing*. Thereafter, the Commission issued its *Order Directing Filing* wherein it directed Summit to respond to the Staff Recommendation by January 27, 2021.

2. On January 25, 2021, SNGMO filed a Motion for Extension requesting the deadline be extended to March 2, 2021. The Company indicated that after review of the recommendation and discussions with Staff, further discussion would be beneficial to efficient processing. Further, Staff had no objection to the requested deadline extension.

3. On January 25, 2021, the Commission issued its Order Granting Extension and extending the deadline to March 2, 2021.

4. Since that time, the Company and Staff have exchanged additional information. However, because of other events, neither believes that this process will be completed by March 2, 2021. Accordingly, SNGMO requests that the date to respond to the Staff Recommendation be further extended until March 23, 2021.

5. Counsel for Staff has indicated that Staff has no objection to this *Second Motion for Extension*.

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WHEREFORE, SNGMO requests that the Commission extend the deadline for its response to the Staff Recommendation until March 23, 2021, and grant such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:

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ATTORNEYS FOR SUMMIT NATURAL GAS OF MISSOURI, INC.

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 23rd day of February, 2021, to:

Karen Bretz General Counsel's Office <u>staffcounselservice@psc.mo.gov</u> <u>karen.bretz@psc.mo.gov</u>

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