

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

In the Matter of the Application of Summit Natural Gas)
Of Missouri Inc., for Permission and Approval and a)
Certificate of Convenience and Necessity to Construct,) **Case No. GA-2018-0396**
Install, Own, Operate, Maintain, and Otherwise Control)
And Manage a Natural Gas Distribution System in to)
Provide Gas Service in Lawrence County as an)
Expansion of its Existing Certificated Areas)

MOTION FOR LEAVE TO FILE COMMENTS
BY INTERESTED PARTIES

COMES NOW Paul and Debra Brown, (“Brown’s”), by and through counsel,
and respectfully request leave to file comments in the above case based on the fact that they are
interested parties. In support thereof, the Brown’s offer the following:

1. On January 20, 2017, the Brown’s filed a complaint, *Paul and Debra Brown vs. Summit Natural Gas of Missouri, Inc.*, Case No. GC-2017-0199 seeking natural gas service for their residence located in Lawrence County and within the territory of Spire Missouri, Inc. (“Spire”)
2. On May 23, 2018, a Stipulation and Agreement was filed by the Browns and Summit Natural Gas of Missouri Inc. (“SNGMO”) which was ultimately approved by the Commission on June 6, 2018.
3. SNGMO filed this case, GA-2018-0396, seeking a CCN and a waiver/variance for the Brown’s property in accordance with the Stipulation and Agreement approved by the Commission.
4. This case is the direct result of the complaint case filed by the Browns, GC-2017-0199.

5. On July 20, 2018, Spire filed their Motion to Intervene in GA-2018-0396,
GA-2018-0396.
6. The CCN and waiver/variance, if granted, would apply only to the Brown's property,
and any ruling of the Commission in this case will directly impact the Browns.

WHEREFORE, based on the foregoing, the Browns respectfully request the Commission
allow them to comment on the responsive pleadings filed in the above case.

Respectfully submitted,

HEALY LAW OFFICES, LLC



By: _____

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ATTORNEYS FOR THE BROWNS

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent
by electronic mail this 14th day of August, 2018 to:

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