

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

In the matter of the application of Summit Natural Gas of Missouri, Inc. for authority to amend and extend the term of its existing Credit Agreement, and to extend the term of its outstanding secured indebtedness of \$100,000,000 with the issuance of one or more new promissory notes )  
)  
) File No. GF-2018-0041  
)  
)

**MOTION FOR PROTECTIVE ORDER**

COMES NOW Summit Natural Gas of Missouri, Inc. ("Applicant"), by and through its undersigned counsel, pursuant to rule 4 CSR 240-2.135(3), and for its Motion for Protective Order by the Missouri Public Service Commission ("Commission"), states:

1. Contemporaneously herewith, Applicant has caused to be filed an Application and Request for Waiver for authority to enter into a senior secured term loan to refinance outstanding indebtedness under a credit agreement which matures on December 31, 2017. With the Commission's authorization, Applicant plans to amend and restate the credit agreement to reflect a different lender syndicate, to refinance the indebtedness, and to make certain other amendments.

2. The Application contains financial information that has not been publicly disclosed, such as financial statements, and terms and conditions of proposed amendments to the credit agreement, including issuance costs, facility fees, maximum loan amounts, debt amounts, terms of credit and security agreements, and restrictive covenants. Disclosure of this information could cause Applicant and its affiliates to suffer damages to its and their competitive or financial positions or cause them to violate their contractual obligations. Applicant anticipates that, during the course of the proceeding related to the Application, the Commission's staff ("Staff"), or another proper

party, may request other information from Applicant that is confidential, proprietary or competitively sensitive, and that is related to Applicant's and/or its affiliates' business activities.

3. The Commission's issuance of a Protective Order will facilitate the expeditious provision of confidential, proprietary or competitively sensitive information necessary to support the Application, will help inform Staff during its review, and will help ensure that public disclosure of confidential, proprietary and competitively sensitive information does not hamper Applicant's or its affiliates' ability to operate their businesses in an economic and competitive manner, and help to keep them from violating their contractual obligations.

4. Applicant and its affiliates have maintained the confidentiality of the information for which Applicant requests a Protective Order, and the information has not otherwise been publicly disclosed.

WHEREFORE, Applicant requests that the Commission (1) issue a Protective Order finding, for good cause shown, it is appropriate for the information redacted from the public version of the Application to be designated as highly confidential, and that such information retain its preliminary designation as highly confidential in the Commission's electronic filing and information system (EFIS), and (2) grant such other orders and relief as may be appropriate in the circumstances.

Respectfully submitted,

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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 above and foregoing document was electronically transmitted, on this 12<sup>th</sup> day of October, 2017, to:

Office of the General Counsel  
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