

**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, Install, Own, ) File No. GA-2017-0016  
Operate, Maintain, and Otherwise Control and Manage )  
a Natural Gas Distribution System to Provide Gas )  
Service in various counties as an Expansion of its )  
Existing Certificated Areas )

**APPLICATION TO INTERVENE**  
**BY THE MISSOURI PROPANE GAS ASSOCIATION**

COMES NOW the Missouri Propane Gas Association (“MPGA”), by and through counsel, pursuant to Commission Rule 4 CSR 240-2.075, and respectfully applies for intervention as a party in this case initiated by Summit Natural Gas of Missouri, Inc., (“Summit” or “Company”). In support of this application, MPGA states as follows:

1. MPGA is a non-profit corporation in good standing organized under the laws of the State of Missouri. MPGA is a trade association representing members who sell propane or propane appliances and equipment in Missouri. Its website can be accessed at <http://www.missouripropane.com/>.

2. Correspondence, communications, orders and the decision in this matter should be addressed to:

Terry M. Jarrett  
HEALY LAW OFFICES, LLC  
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3. On July 19, 2016, the Commission issued an Order directing interested parties to intervene no later than August 19, 2016, and thus this Application is timely.

4. MPGA has a direct interest in this matter as Summit will compete for customers with MPGA member propane dealers in the proposed expanded service territories detailed in its Application. This interest is different than the general public interest.

5. At this time, MPGA is unable to state its position relating to the relief sought by Summit. However, based on Summit's past performance, MPGA is concerned that Summit may not be able to meet projected customer conversions and sales volumes in the proposed expansion areas. MPGA is continuing to review Summit's filing and reserves the right to provide the Commission with more detailed positions on Summit's proposals and testimony submitted in this case.

6. MPGA believes that its intervention and participation in this proceeding would serve the public interest by clarifying the issues under consideration, ensuring completeness of the record, and assisting the Commission in its decision-making in this case, and wishes to become a party to this case for all purposes.

WHEREFORE, MPGA respectfully requests that the Commission grant its Application to Intervene, entitling it to fully participate in this proceeding.

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties on the official service list for this case on this 12<sup>th</sup> day of August, 2016.

A handwritten signature in black ink that reads "Terry M. Jarrett". The signature is written in a cursive style with a horizontal line extending from the end of the name.

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Terry M. Jarrett