

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

In the Matter of Summit Natural Gas of)	
Missouri Inc.'s Filing of Revised Tariffs)	Case No. GR-2014-0086
To Increase its Annual Revenues For)	Tracking No. YG-2015-0207
Natural Gas Service)	

RESPONSE TO PUBLIC COUNSEL'S REPLY

COMES NOW Summit Natural Gas of Missouri, Inc. (SNGMO or Company), and, in response to Public Counsel's Reply to Motion for Expedited Treatment, states as follows to the Missouri Public Service Commission (Commission):

1. On October 29, 2014, the Commission issued its Report and Order (effective November 28, 2014). In that Order, among other things, the Commission ordered SNGMO to file tariff sheets consistent with the Report and Order.

2. On November 14, 2014, SNGMO filed those tariff sheets, along with a Motion for Expedited Treatment asking that the tariffs be permitted to go into effect on December 1, 2014.¹ The Commission directed that responses to the Motion for Expedited Treatment and the proposed tariffs be filed by November 21, 2014.

3. The Staff filed its Recommendation to Approve Tariff Sheets on November 21, 2014. Therein, Staff recommended that the tariff sheets be approved with an effective date of December 1, 2014. Staff recommends the Commission grant SNG's motion for expedited treatment, because the requested effective date of December 1, 2014, "is consistent with the Commission's January 8, 2014, *Notice of Contested Case and Order Suspending Tariff and Delegating Authority*, which suspended SNG's filed tariff sheets until December 1, 2014."

¹ SNGMO later filed a single substitute sheet on November 19, 2014.

4. Also on November 21, 2014, the Office of the Public Counsel (Public Counsel) filed its Reply to Motion for Expedited Treatment. The Public Counsel takes the position that the subject tariff sheets should be allowed to go into effect on December 14, 2014. Public Counsel argues that “the large increase granted by the Order will have a negative effect on the majority of Summit’s customers, and speeding up the effective date of the tariff will create an additional negative effect by causing the rate increase to occur earlier than necessary.” (Pub. Counsel Rep., para. 6).

5. In fact, a December 1, 2014 effective date will not be “earlier than necessary.” As noted by the Staff, December 1, 2014, will represent the full eleven month delay permitted by Section 393.150, RSMo, as SNGMO initiated this case with the filing of proposed tariff sheets on January 2, 2014.

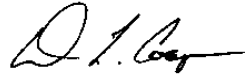
6. The subject tariff sheets implement the rate relief that the Commission has found to be just and reasonable. A December 1, 2014 effective date will be consistent with the public interest as established by the General Assembly and Commission order.

7. Lastly, it is important what the Public Counsel Reply does not say. Public Counsel does not allege any deficiency with the tariff sheets or that the tariff sheets fail to accurately implement the Commission’s Report and Order. The only party to substantively address the tariff sheets – the Commission Staff – stated that it “reviewed SNG’s compliance tariff sheets filed on November 14 and November 19, and found that they comply with the Commission’s *Report and Order*.”

WHEREFORE, for the foregoing reasons, SNGMO respectfully requests the Commission to grant SNGMO’s Motion for Expedited Treatment and approve SNGMO’s

proposed tariff sheets (Tracking No. YG-2015-0207) to be effective on December 1, 2014.

Respectfully submitted,



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ATTORNEYS FOR SUMMIT NATURAL
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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 November, 2014, to:

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