

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

In the matter of the application of Summit Natural)
Gas of Missouri, Inc., for a certificate of)
convenience and necessity authorizing it to)
construct, install, own, operate, control, manage) File No. GA-2012-0285
and maintain a distribution system to provide gas)
service in Benton, Morgan, Camden and Miller)
Counties in Missouri, as a certificated area.)

SNGMO'S MOTION FOR LEAVE TO AMEND APPLICATION

Comes now Summit Natural Gas of Missouri, Inc. (formerly known as Missouri Gas Utility, Inc.) (SNGMO or Applicant), and, as its Motion for Leave to Amend Application, states as follows to the Missouri Public Service Commission's (Commission):

1. On March 2, 2012, SNGMO filed an Application for a certificate of convenience and necessity. Later, on April 17, 2012, SNGMO filed a Supplement to Application, wherein it added a section to the legal description of the requested territory.
2. Commission Rule 4 CSR 240-2.080(20) states, in part, that "Any pleading may be amended within ten (10) days of filing, unless a responsive pleading has already been filed, or at any time by leave of the commission."
3. SNGMO seeks the Commission's leave to amend the Application by deleting Paragraph 9 in its entirety and substituting in lieu thereof the following:

Due to the increased cost of materials and labor, Applicant is proposing the following rates that SNGMO intends to charge in this new rate area:

GS Class Customer Charge	\$15.00/month
GS Class Commodity Charge	\$0.950/CCF

CS Class Customer Charge	\$30.00/month
CS Class Commodity Charge	\$0.100/CCF
LVS Class Customer Charge	\$100.00/month
LVS Class Commodity Charge	\$0.100/CCF

4. This amendment does not impact the financial conclusions of the feasibility study filed in the original application. However, in order to reflect the elimination of the proposed separate “surcharge,” SNGMO also seeks the Commission’s leave to amend the Application by deleting the Rate Analysis tab of the Feasibility Study in its entirety and substituting in lieu thereof the document attached hereto as **Appendix 1** (Highly Confidential).

5. Staff has indicated it has no objection to a grant of this motion for leave to amend.

6. SNGMO believes that good cause exists for a grant of the requested motion for leave to amend as a grant of the motion bring SNGMO's Application in line with the proposal of a party and such amendment will not prejudice the parties, nor delay the processing of this Application.

WHEREFORE, SNGMO respectfully requests that the Commission issue its order granting SNGMO leave to amend its Application as described herein.

Respectfully submitted,

D. T. Cox

Dean L. Cooper MBE# 36592
BRYDON, SWEARENGEN & ENGLAND P.C.
312 East Capitol Avenue
P.O. Box 456
Jefferson City, MO 65102-0456

Telephone: (573) 635-7166
Facsimile: (573) 635-0427
dcooper@brydonlaw.com

**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 21st day of May, 2012, to:

Bob Berlin
General Counsel's Office
Missouri Public Service Commission
Bob.Berlin@psc.mo.gov

Marc Poston
Office of the Public Counsel
Governor's Office Building
marc.poston@ded.mo.gov

