

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

In the Matter of Summit Natural Gas of)	
Missouri, Inc.'s Proposed Conversion)	File No. GO-2013-0360
Program Extension.)	

**SNG RESPONSE TO STAFF REQUEST
AND MOTION TO ESTABLISH PROCEDURAL SCHEDULE**

COMES NOW Summit Natural Gas of Missouri, Inc. (SNG or Company) and, in response to the Staff Request for Order Directing Notice and as its motion to establish procedural schedule, states as follows to the Missouri Public Service Commission (Commission):

NOTICE

1. On February 6, 2013, the Staff of the Commission (Staff) filed its Request for Order Directing Notice. Therein, Staff requested the Commission direct SNG “to file an Application for variance and serve it according to the Commission’s rules or, in the alternative, ordering that notice of this case be given to each public utility providing the same or competing utility service in all or any portion of the Summit service area (including The Empire District Electric Company) and to anyone else the Commission deems proper, and that such parties be give the opportunity to intervene in this case.”

2. SNG believes that its tariff filing has put before the Commission all issues associated with the subject conversion program. Accordingly, filing an “application” would not add anything to this issue. This having been said, SNG would not object to filing a motion for variance/waiver in this case, if that would assist in moving this matter to a substantive resolution.

3. If the real objective of Staff’s Request is to insure that notice is provided to public utilities (electric and gas) providing service in the territory to which the proposed tariff sheet

would apply, SNG has no objection to the issuance of that notice. In fact, the only public utility that would fit this description is The Empire District Electric Company.

PROPOSED PROCEDURAL SCHEDULE

4. As stated in previously filings, the conversion program at issue in this case is important to SNG's operations in the southern part of Missouri. It is a program that has a direct impact upon the Company's ability to obtain customers and provide a dependable and affordable natural gas system to a part of the state that would not otherwise have this energy source as an option.

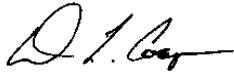
5. The Commission has suspended the tariff at issue until March 30, 2013. In preparation for the prehearing conference in this matter, SNG has proposed a procedural schedule that would allow for an evidentiary hearing and put this matter before the Commission for decision prior to March 30, 2013. SNG's discussions with counsel for Staff and the Office of the Public Counsel lead it to believe that the parties will not be able to reach agreement on a schedule that would provide for a decision by March 30.

6. As a result, and because the timing of this matter is critical to SNG and further discussion is not likely to lead to agreement on this subject, SNG moves the Commission to establish the following procedural schedule:

EVENT	DATE
All data requests – 5 calendar day turnaround	
Company Direct	February 7
Rebuttal	February 21
Surrebuttal	February 28
List of Issues, etc.	March 1
Statement of Position	March 4
Hearing	March 6
Simultaneous Briefs	March 15
Tariff Effective Date	March 30

WHEREFORE, SNG respectfully requests that the Commission consider the above information and pleading and, thereafter, issue such order as it should believe to be reasonable and just.

Respectfully submitted,



Dean L. Cooper MBE#36592
BRYDON, SWEARENGEN & ENGLAND P.C.
312 E. Capitol Avenue
P. O. Box 456
Jefferson City, MO 65102
(573) 635-7166
(573) 635-3847 (facsimile)
dcooper@brydonlaw.com

ATTORNEYS FOR SUMMIT NATURAL GAS
OF MISSOURI, INC.

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail or by U.S. Mail, postage prepaid, on February 7, 2013, to the following:

Jeffrey Keevil
Office of the General Counsel
Governor Office Building
Jefferson City, MO 65101
gencounsel@psc.mo.gov
jeff.keevil@psc.mo.gov

Marc Poston
Office of the Public Counsel
Governor Office Building
Jefferson City, MO 65101
opcservice@ded.mo.gov
marc.poston@ded.mo.gov

