

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

In the Matter of a Review of the Commission's)
Natural Gas Safety Rules)

File No. GW-2017-0347

Preliminary Comments of Summit Natural Gas of Missouri, Inc.

COMES NOW Summit Natural Gas of Missouri, Inc. ("SNGMo"), and for its preliminary comments regarding proposed amendments to rules 4 CSR 240-3.270, 4 CSR 240-3.280, 4 CSR 240-3.290, 4 CSR 240-3.295, 4 CSR 240-40.020, 4 CSR 240-40.030 and 4 CSR 240-40.080 proposed by the staff of the Missouri Public Service Commission ("Commission") states as follows:

1. On March 1, 2018, the Commission's staff ("Staff") filed a Motion for Comment on Proposed Amendments ("Motion") with regard to the Commission's gas safety rules 4 CSR 240-3.270, 4 CSR 240-3.280, 4 CSR 240-3.290, 4 CSR 240-3.295, 4 CSR 240-40.020, 4 CSR 240-40.030 and 4 CSR 240-40.080. The stated grounds for the proposed rule amendment are updates made to federally-mandated natural gas safety rules. The Motion requested that Missouri's natural gas utility operators and other interested parties be given the opportunity to comment on Staff's draft rule amendments in written comments.

2. Based on the Motion, the Commission that same day issued an Order Inviting Responses to Draft Natural Gas Safety Rule Revisions ("Order") to be submitted by March 16, 2018. The Order specifically notes there will be an opportunity for additional comment during the formal rulemaking procedure.

3. SNGMo is a regulated natural gas utility operator in those areas of the State of Missouri certificated to it by the Commission and it is pleased to have been given the opportunity to offer these comments informally in this working docket. SNGMo reserves the right to offer these and additional comments during the formal rulemaking proceeding to follow.

4. SNGMo submits in the attached appendix its preliminary comments with regard to the proposed rule amendments. The comments are presented in summary tabular form for the convenience of the Commission and Staff.

WHEREFORE, SNGMO provides its comments in response to the Order for the consideration of the Commission and Staff.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail to the following counsel this 16th day of March, 2018:

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