

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

APPLICATION FOR CCN AND REQUEST FOR WAIVER

COMES NOW Summit Natural Gas of Missouri, Inc. (“SNGMO” or the “Company”), by and through its undersigned counsel, and, pursuant to RSMo. §393.170 and Commission Rules 4 CSR 240-2.060 and 240-3.205, requests permission and approval and a certificate of convenience and necessity (“CCN”) to construct, install, own, operate, maintain, and otherwise control and manage a natural gas distribution system to provide gas service in Barry, Daviess, Laclede, Lawrence, Pettis, Stone, Taney, and Webster Counties, Missouri, as a further expansion of its existing certificated area. In support thereof, SNGMO respectfully states as follows to the Missouri Public Service Commission (“Commission”):

1. SNGMO is a wholly owned subsidiary of Summit Utilities, Inc., and is a corporation duly incorporated under the laws of the State of Colorado with its principal offices located at 7810 Shaffer Parkway, Suite 120, Littleton, Colorado, 80127. A copy of a certificate from the Missouri Secretary of State that SNGMO is authorized to do business in Missouri as a foreign corporation was submitted in Case No. GA-2012-0285 and is incorporated by reference. Other than cases that have been docketed at the Commission, SNGMO has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court within the past three years that involve customer service or rates. SNGMO has no annual report or assessment fees that are overdue.

2. SNGMO conducts business as a “gas corporation” and a “public utility” as those terms are defined in RSMo. §386.020, and provides natural gas service in the Missouri counties of Harrison, Daviess, Caldwell, Pettis, Benton, Morgan, Camden, Miller, Greene, Webster, Laclede, Wright, Douglas, Texas, Howell, Lawrence, Barry, Stone, and Taney, subject to the jurisdiction of the Commission as provided by law.

3. All correspondence, communications, notices, orders and decisions of the Commission with respect to this matter should be sent to the undersigned counsel and:

Matthew Kaply
Sr. Director Legislative and Regulatory Affairs
Summit Utilities Inc.
7810 Shaffer Pkwy., Ste. 120
Littleton, CO 80127
Telephone: 207-621-8000 ex. 430
Email: mkaply@summitnaturalgas.com

4. SNGMO seeks a service area CCN for the areas described in **Appendix A**. The proposed service areas are shown as red blocks on the maps attached hereto as **Appendix B**. SNGMO holds a CCN for natural gas service for areas adjoining the service areas being requested by this Application.

5. Most of the areas for which SNGMO is seeking to be certificated by this Application are already developed. In those areas, the subject natural gas system has already been constructed and is in operation. The remaining areas are adjacent to existing SNGMO gas facilities and are likely areas of expansion. Natural gas service is not currently offered in any of the areas for which a CCN is sought by any unregulated entity or other regulated entity. (Rule 4 CSR 240-3.205(1)(A)(1))

6. There are ten or more residents or landowners in the areas, and, as such, pursuant to Rule 4 CSR 240-3.205(1)(A)(2), a listing of the names and addresses of ten or more residents

or landowners is attached hereto as **Appendix C-HC**. This appendix has been identified as High Confidential because it contains information relating directly to specific customers.

7. In order to provide natural gas service to most of the described areas, SNGMO will not need to install any new pipes or other facilities and will not need to engage in any construction, nor require any new financing. As such, SNGMO has not created a feasibility study containing plans and specifications and the estimated cost of construction, and there are no plans for financing.

8. SNGMO holds franchises and permits from municipalities, counties, or other authorities that are required for SNGMO to serve the areas.

9. Pursuant to Rule 4 CSR 240-3.205(1)(A)(5), attached as **Appendix D Proprietary** is an estimate of the number of customers, revenues, and expenses for service to these areas for the following three years. This appendix has been identified as Proprietary because it contains confidential business information. To the extent necessary, SNGMO requests a waiver as to any additional information that might be required in a feasibility study (4 CSR 240-3.205(1)(A)(5)).

10. The rates for the proposed sections will be those currently approved and in effect for services provided in SNGMO adjacent certificated territories under SNGMO's existing tariff. Construction methods have followed SNGMO's customary standards and the rules of the Commission. SNGMO plans to use the general terms and conditions of service found in SNGMO's currently approved tariffs.

11. The areas SNGMO proposes to certificate have a need for a natural gas system and otherwise have no natural gas service available. SNGMO's experience in the operation of

natural gas systems gives it the ability to provide this service in an efficient manner. For these reasons, a grant of the application will further the public convenience and necessity.

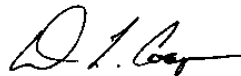
12. SNGMO has not filed a 60-day notice pursuant to 4 CSR 240-4.020(2), and, pursuant to 4 CSR 240-4.020(2)(B), requests a waiver of this requirement. Although RSMo. §393.170 requires a hearing, or the opportunity for a hearing, before a CCN is granted, SNGMO does not anticipate this proceeding being controversial or “contested” in that sense. With regard to the 60-day period prior to the filing of this Application, SNGMO represents to the Commission that it did not engage in any conduct which would have constituted a violation of any ex parte rule or standard of conduct if the notice had been filed pursuant to 4 CSR 240-4.020(2).

WHEREFORE, SNGMO requests, for good cause shown, that the Commission waive the notice requirement of 4 CSR 240-4.020(2), approve this Application, and issue a CCN to SNGMO as set forth above. SNGMO requests such other and further relief as is just and proper under the circumstances.

Respectfully submitted,

BRYDON, SWEARENGEN & ENGLAND P.C.

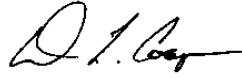
By:



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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been sent by electronic mail this 15th day of July, 2016, to the Office of the General Counsel and the Office of the Public Counsel.



D. J. Coyle

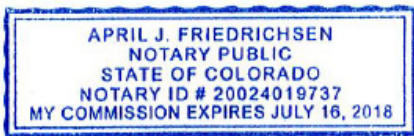
VERIFICATION

State of Colorado)
) ss
County of Jefferson)

I, Hannah Ahrendt, having been duly sworn upon my oath, state that I am Regulatory Specialist II of Summit Natural Gas of Missouri, Inc., and that I have knowledge of the matters stated herein, and that the matters and things stated in the foregoing Application and appendices thereto are true and correct to the best of my information, knowledge and belief.

Hannah Ahrendt

Subscribed and sworn before me this 13th day of July, 2016.



April J. Friedrichsen
Notary Public