

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

In the matter of the application of Summit Natural Gas of Missouri, Inc. for authority to amend and extend the term of its existing Credit Agreement, and to extend the term of its outstanding secured indebtedness of \$100,000,000 with the issuance of one or more new promissory notes)
)
) File No. GF-2018-0041
)
)

**RESPONSE OF
SUMMIT NATURAL GAS OF MISSOURI
TO STAFF'S RECOMMENDATION**

COMES NOW Summit Natural Gas of Missouri, Inc. ("Applicant"), by and through its undersigned counsel, and for its response to Staff's Recommendation, states to the Missouri Public Service Commission ("Commission") as follows:

1. On October 12, 2017, Applicant filed with the Commission an application for authority to incur up \$100,000,000 of long-term, secured indebtedness pursuant to a term loan arrangement (the "Application").

2. On December 12, 2017, Staff filed its Recommendation which, among other things, recommended that the Application be approved subject to four conditions as set forth in Staff's Memorandum, which was attached to Staff's Recommendation.

3. Applicant has no objection to Staff's first three recommended conditions to approval. As to condition No. 4¹, Applicant is concerned that such a dollar cap may not be sufficient to address all of the obligations contemplated by the credit documents. Understanding and appreciating the purpose to be served by Staff's condition No. 4,

¹ 4. That the amount authorized for purposes of the requested lien or encumbrance shall be limited to \$100,000,000.

Applicant requests the Commission use in lieu thereof, the following alternative language:

“4. That the amount authorized for purposes of the requested lien or encumbrance shall be limited to amounts due and owing under the amended and restated Credit Agreement and the transactions contemplated thereby.”

Applicant has discussed this alternative language with Staff and is authorized to represent to the Commission that Staff has no objection to Applicant’s proposal.

4. As stated in the Application, Applicant’s existing credit arrangement expires at the end of December of this year. Consequently, Applicant urges the Commission to issue an order approving the Application as soon as is practical, said order bearing an effective date of not more than ten (10) days from the date of issuance.

WHEREFORE, Applicant requests that the Commission consider this pleading and issue such orders as are appropriate in the circumstances.

Respectfully submitted,

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**Attorneys for Summit Natural Gas of
Missouri, Inc.**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was electronically transmitted, on this 7th day of December, 2017, to:

Office of the General Counsel
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