

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

In the Matter of the Application of Summit Natural Gas)
of Missouri Inc., for Certificates of Convenience and)
Necessity to Construct, Install, Own, Operate, Maintain,)
and Otherwise Control and Manage Natural Gas Lines to) **File No. GA-2020-0251**
Provide Gas Service in certain areas of Laclede and)
Webster Counties in Conjunction with its Existing)
Certificated Areas)

COMPANY RESPONSE TO STAFF RECOMMENDATION

COMES NOW Summit Natural Gas of Missouri, Inc. (“SNGMO” or the “Company”), by and through the undersigned counsel, and for its response to the *Staff Recommendation* respectfully states to the Missouri Public Service Commission (“Commission”) as follows:

1. On February 21, 2020, SNGMO filed an *Application For Certificates of Convenience And Necessity And Motion For Waiver (“Application”)*¹ requesting that the Commission grant the Company two service area certificates of convenience and necessity (“CCNs”) to provide natural gas service to potential customers located within areas that are adjacent to SNGMO’s existing certificated areas in Laclede and Webster County, Missouri, but through which SNGMO proposes constructing certain upgrades to its transmission system.

2. On February 24, 2020, the Commission issued its *Order Directing Notice, Setting Deadline For Intervention Requests, and Directing Filing of Staff Recommendation (“Order”)*. The *Order* directed Staff to file a recommendation regarding SNGMO’s *Application* no later than April 24, 2020.

¹ As supplemented by SNGMO’s *Supplement To Application For Certificates of Convenience and Necessity* filed April 7, 2020, to provide additional supporting information after discussions with Staff.

3. On April 24, 2020, Staff filed its *Staff Recommendation* and *Memorandum* in this case. Staff recommends the Commission approve SNGMO's *Application* subject to three (3) conditions:


- Reserve all rate making determinations regarding the revenue requirement impact of this service area extension request until the Company's next general rate making proceeding, subject to the in-service criteria listed in Staff's *Memorandum*.
- Reserve all determination regarding prudence of the proposed project until the Company's next general rate making proceeding.
- Require SNGMO to file to update its tariffs to incorporate the requested sections for Laclede County and Webster County provided in Staff's *Memorandum*.

4. SNGMO has reviewed the *Staff Recommendation* and *Memorandum* and states that it has no objection to the Commission approving the *Application* subject to the three (3) conditions requested by Staff and set forth above.

WHEREFORE, SNGMO requests that the Commission issue an Order approving the *Application* subject to the conditions requested by Staff, and for such other relief as the Commission deems just and proper.

Respectfully submitted,

BRYDON, SWEARENGEN & ENGLAND P.C.

By: 

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**ATTORNEYS FOR SUMMIT NATURAL
GAS OF MISSOURI, INC.**

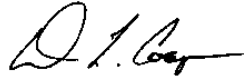
CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail to the following counsel this 4th day of May 2020:

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