

In the Matter of the Application of)
Summit Natural Gas of Missouri, Inc.) File No. _____
for Waiver Concerning Commission)
Rule 4 CSR 240-3.235.)

COMES NOW Summit Natural Gas of Missouri, Inc. (“SNG” or “Company”), pursuant to 4 CSR 240-2.060 and 4 CSR 240-3.015, and, for its Application for Waiver, respectfully states as follows to the Missouri Public Service Commission (“Commission”).

1. SNG 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 SNG is authorized to do business in Missouri as a foreign corporation was submitted in Case No. GA-2012-0285 and is incorporated by reference in accordance with Commission Rule 4 CSR 240-2.060(1)(G). Other than cases that have been docketed at the Commission, SNG has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court within the past three (3) years that involve customer service or rates. SNG has no annual report or assessment fees that are overdue.

1

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

Martha Wankum
Missouri Regulatory Manager
Summit Natural Gas of Missouri, Inc.
312 East Capitol Avenue
Jefferson City, MO 65101
Telephone: 573-635-9150
Facsimile: 573-635-8285
Cell: 573-317-7863
Email: mwankum@summitutilitiesinc.com

and

Michelle A. Moorman
Director of Regulatory Affairs
Summit Natural Gas of Missouri, Inc.
7810 Shaffer Parkway, Suite 120
Littleton, CO 80127
Telephone: 720-981-2127
Facsimile: 720-981-2129
Cell: 303-478-0329
Email: mmoorman@summitutilitiesinc.com

WAIVER REQUEST

4. SNG intends to file a general rate increase request in or around January 2014.
5. Commission Rule 4 CSR 240-3.235 concerns the subject of filing requirements for gas utility general rate increase requests. That rule provides as follows:

(1) In addition to the requirements of 4 CSR 240-3.030, any gas utility which submits a general rate increase request shall submit the following:

(A) Its depreciation study, database and property unit catalog. However, a gas utility need not submit a depreciation study, data- base or property unit catalog to the extent that the commission's staff received these items from the utility during the three (3) years prior to the utility filing for a general rate increase or before five (5) years have elapsed since the last time the commission's staff received a depreciation study, database and property unit catalog from the utility. The depreciation study, database and property unit catalog shall be compiled as follows:

1. The study shall reflect the average life and remaining life of each primary plant account or subaccount;
2. The database shall consist of dollar amounts, by plant account or subaccount, representing—
 - A. Annual dollar additions and dollar retirements by vintage year and year retired, beginning with the earliest year of available data;
 - B. Reserve for depreciation;
 - C. Surviving plant balance as of the study date; and
 - D. Estimated date of final retirement and surviving dollar investment for each warehouse, propane/air production facility, liquefied natural gas facility, underground natural gas storage facility, general office building or other large structure; and
3. The property unit catalog shall contain a description of each retirement unit used by the utility.

6. In the absence of this requested waiver, SNG would be required to submit a depreciation study with the rate case it intends to file in or around January of 2014.

7. SNG has been using the depreciation rates directed by the Commission's Order Granting Certificate of Convenience and Necessity in Case No. GA-2012-0285.

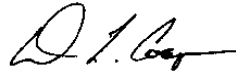
8. SNG has a lot of new assets including relatively new service territories in Warsaw, Lebanon, Branson and Lake of the Ozarks, Missouri. For this reason, SNG does not have a great deal of historical plant information to utilize in performing a depreciation study. Given the lack of Company-specific historical information, the completion of a depreciation study would add rate case expense without any corresponding benefit to SNG or its customers.

9. Therefore, SNG hereby requests a waiver from Commission Rule 4 CSR 240-3.235, that will allow SNG to file and maintain its next general rate case without the submission of a depreciation study.

WHEREFORE, SNG respectfully moves the Commission to grant the Company a waiver from the requirements of Commission Rule 4 CSR 240-3.235 in regard to its next

general rate case, as described herein.

Respectfully submitted,



Dean L. Cooper Mo. Bar 36592
BRYDON, SWEARENGEN & ENGLAND P.C.
312 East Capitol Avenue
P.O. Box 456
Jefferson City, MO 65102-0456
Telephone: (573) 635-7166
Facsimile: (573) 635-0427
dcooper@brydonlaw.com

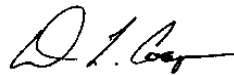
ATTORNEYS FOR SUMMIT NATURAL
GAS OF MISSOURI, INC.

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail to the following counsel this 9th day of July, 2013:

Robert Berlin
Office of the General Counsel
Missouri Public Service Commission
Governor State Office Building
Jefferson City, Missouri 65101
Bob.berlin@psc.mo.gov

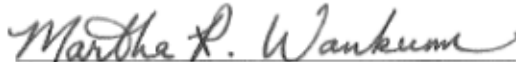
Marc Poston
Office of the Public Counsel
Governor State Office Building
Jefferson City, Missouri 65101
marc.poston@ded.mo.gov



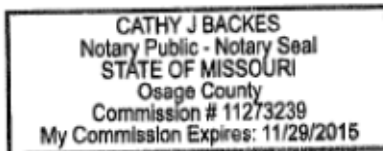
AFFIDAVIT

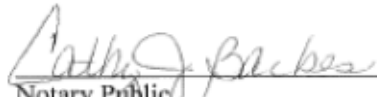
STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

I, Martha R. Wankum, having been duly sworn upon my oath, state that I am the Regulatory Manager for Summit Natural Gas of Missouri, Inc., that I am duly authorized to make this affidavit on behalf of Summit Natural Gas of Missouri, Inc., and that the matters and things stated in the foregoing Application are true and correct to the best of my information, knowledge and belief.


Martha R. Wankum

Subscribed and sworn to before me this 9th day of July, 2013.




Notary Public

My commission expires: 11/29/15