

**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. GA-2018-0396
and Manage a Natural Gas Distribution System to)
Provide Gas Service in Lawrence County as an)
Expansion of its Existing Certificated Areas)

**SPIRE MISSOURI INC.’S RESPONSE TO STAFF RECOMMENDATION
FOR APPROVAL OF SUMMIT COMPLIANCE TARIFF FILING**

COMES NOW Spire Missouri Inc. (“Spire Missouri” or “Company”) and files this Response to Staff’s August 31 filing recommending approval of Summit’s August 27 tariff filing in this case, and respectfully states as follows:

1. In this response, Spire Missouri requests that Summit’s tariff be amended to cover only the one residence currently existing on the 5-acre property described in Summit’s tariff filing.
2. In previous filings in this case on August 6 and August 15, Spire Missouri made it clear that it supported the single customer involved in this case obtaining gas service from Summit Natural Gas of Missouri Inc. (“Summit”), despite the fact that the customer’s residence was in Spire Missouri West Territory. However, Spire Missouri separately sought to find a long-term solution with Summit to aid Summit in complying with a 2007 agreement between Spire Missouri West and Summit that has been repeatedly violated.
3. On August 15, 2018, the Commission approved Summit’s request to serve the single customer. On page 4 of the Order, the Commission stated the following:

“The Commission strongly encourages Spire Missouri and Summit to continue discussions outside the confines of this proceeding and return to the Commission with further modifications, if any, of their stipulation and agreement in File No. GA-2007-0168.”

Spire Missouri appreciates the Commission acknowledging the Company's request and strongly encouraging continued discussions. As the Company indicated in its August 6 filing in this case, Spire Missouri had an initial call with Summit in late July, but has not yet received any follow-up. Spire Missouri intends to do its part to facilitate continued discussions.

4. In the August 15 Order, the Commission also noted that "Summit will not need to install or construct any new facilities other than extending the service line in order to provide service to the *subject residence*." (p. 3, emphasis supplied) As stated above, Spire Missouri does not object to Summit serving the subject residence. However, Summit filed a tariff that covers 5 acres, most of which appears to be unnecessary to serve the customer's residence. In the future, those acres could be subdivided and turned into several homes, or part of the property could be changed to other uses, such as commercial. Given the unusual and undesirable outcome of having one utility serve a customer in another utility's certificated territory, the extent of that service should be reasonably minimized.

5. Spire Missouri request that Summit's tariff be amended to indicate that Summit's certificated territory extends only to the single-family residence currently existing on the 5-acre property.

WHEREFORE, Spire Missouri respectfully requests that the Commission direct Summit to amend its tariff to reflect that its certificated territory extends only to the one residence currently existing on the property and not the entire 5 acres.

Respectfully requested,

SPIRE MISSOURI INC.

By: /s/ Rick Zucker

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Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing pleading was served on the parties to this case on this 6th day of September, 2018, by hand-delivery, e-mail, fax, or United States mail, postage prepaid.

/s/ Marcia Spangler