

**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 COMMENTS

COMES NOW Spire Missouri Inc. (“Spire Missouri” or “Company”) and files these comments, stating as follows:

1. Spire Missouri’s mission statement is to answer every challenge, advance every community and enrich every life through the strength of our energy. Even though it was not economically feasible for the Company to serve the Browns, the Company did what it could to assist the Browns in obtaining service from SNG-Mo (“Summit”), because the Company recognized that having natural gas would enrich their lives. In this case, Spire Missouri has consistently advocated for the Browns to obtain natural gas service without delay.

2. Looking backward, it appears that over the past 10 years there have been several opportunities to use Summit’s line to provide natural gas service to customers in Spire Missouri West service territory when the Company could not feasibly build plant to reach those customers.

3. Looking forward, Spire Missouri West is the utility best prepared to serve customers in its own service territory. Spire Missouri contends that having one company serve customers in another company’s territory is not optimal, nor in the best interests of those customers. For example, should the Browns need a service technician, are they going to call the company that bills them and owns the piping to their home, but does not necessarily have personnel

nearby, or are they going to call the Company that does have personnel in the area? If they call Spire Missouri West, we will answer, but is that fair to Spire Missouri West customers who pay our cost of service?

4. Spire Missouri agrees with Staff that single property CCNs should not be favored. Spire Missouri's position in this case, however, is for the Commission to approve the single property CCN to allow the Browns to move forward expeditiously. At the same time, Spire Missouri seeks to use the variance request process to reach a long-term solution that will provide better service to future customers in similar circumstances. Spire Missouri believes that a transportation service that the Company can purchase from Summit will answer the challenge presented when customers are faced with obtaining service from a remote utility.

5. As we previously noted, Summit is interested in considering the transportation option. Spire Missouri believes that, while this option will probably not affect many customers, it will be beneficial for those customers who are affected.

6. One hardly has to think outside the box to find a solution that will allow the Browns to move forward with obtaining service while directing Summit to work with Spire Missouri on a long-term solution. Granting the CCN and approving the variance conditioned upon Summit taking such action would accomplish this task. In such a case, the regulatory body would be doing something positive for the customers and communities it exists to serve.

WHEREFORE, Spire Missouri respectfully requests that the Commission grant the CCN, and grant the variance requested by Summit, subject to Summit's commitment to work with Spire Missouri on a solution as set forth above.

Respectfully requested,

SPIRE MISSOURI INC.

By: /s/ Rick Zucker

Rick Zucker, #49211
Zucker Law LLC
14412 White Pine Ridge
Chesterfield, MO 63017
Telephone: (314) 575-5557
E-mail: zuckerlaw21@gmail.com

By: /s/ Michael C. Pendergast

Michael C. Pendergast, #31763
Of Counsel, Fischer & Dority, P.C.
Telephone: (314) 288-8723
Email: mcp2015law@icloud.com
423 South Main St. (R)
St. Charles MO 63301

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 15th day of August, 2018, by hand-delivery, e-mail, fax, or United States mail, postage prepaid.

/s/ Marcia Spangler