

Part of the Northwest Quarter (NW1/4) of the Southwest Quarter (SW1/4) of Section Fourteen (14), Township Twenty-six North (26N), Range Twenty-six West (26W), Lawrence County, Missouri, described as beginning at the Northwest corner thereof, thence South 0°02'27" West 281.0 feet along the West line of said Quarter-Quarter, thence South 89°47'47" East 775.09 feet, thence North 0°02'27" East 281.0 feet to the North line of said Quarter-Quarter, thence North 89°47'47" West 775.09 feet along said North line to the point of beginning and containing 5.0 acres, more or less. Subject to County road right of way and any easements or restrictions of record or fact, if any.

The demised property to be used for single family residential uses only.

3. On August 23, 2018, SNGMO filed tariff sheets in accordance with the *Order Granting Certificate of Convenience and Necessity and Granting Waivers*. Three tariff sheets were filed: 1) Sheet No. 3E, containing a map of the above-described area; 2) Sheet No. 4L containing the above-described legal description;¹ and, 3) Sheet No. 5, revising the Table of Contents to recognize the addition of Sheets Nos. 3E and 4L.

4. The *Staff Recommendation for Approval of Compliance Tariff Filing* was filed on August 31, 2018. The Staff Recommendation stated that the Staff had “reviewed the filed tariff sheets and [had] found that they comply with the Commission’s Order.” It further recommended “that that the Commission approve the . . . tariff sheets (Tariff File No. YG-2019-0024), or, in the alternative, allow these tariff sheets to go into effect by operation of law”

5. On September 6, 2018, Spire filed its response to the Staff’s recommendation that the SNGMO compliance tariffs be approved. Later, on September 6, the Commission issued its *Order Setting Time for Response* wherein it directed that any response to the Spire pleading be filed by September 10, 2018.

6. Spire objected to the legal description contained in the proposed SNGMO tariff sheets because it covers 5 acres (all of it the property of the customer in question).

7. No amendment of the tariff is necessary or appropriate at this time. As can be seen above and as has suggested by the Staff, the tariff sheets filed by SNGMO comply with the

¹ The phrase “The demised property to be used for single family residential purposes only” was not included as it is a restriction on use associated with the land, rather than a description of the land’s location.

Commission's *Order Granting Certificate of Convenience and Necessity and Granting Waivers*.

What Spire is asking for is really an amendment of that Order, which became effective on August 25, 2018.² No amendment of the Commission's Order is appropriate and the SNGMO compliance tariffs (Tariff File No. YG-2019-0024) should be approved by the Commission.

8. Spire also makes allegations concerning its desire for the establishment of a transportation service on Summit's intrastate pipeline traversing Spire Missouri West service territory. SNGMO recognizes that the Commission's Order encouraged Spire and SNGMO to continue discussions with regard to that issue (Order, p. 4) As stated in prior pleadings, SNGMO preliminarily discussed this proposal with Spire and SNGMO indicated a willingness to consider it.

9. For this reason, SNGMO was surprised to see Spire's following allegation in regard of the status of this matter:

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.

(Spire Response, p. 2)

10. In response to the referenced August 6 Spire filing in this case, SNGMO sent an e-mail to Spire on the same date seeking to set up a meeting. The correspondence stated as follows:

Good afternoon Eric,

Matt Kaply has asked me to help coordinate a meeting for late August/early September to discuss Spire's interest in receiving transport service from our line that extends from Aurora to Branson. Please let me know what information may be useful to you and your team prior to this meeting, and some days and times that may be convenient for you.

Looking forward to working with you,

² No application for rehearing was filed in regard to this Order.

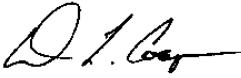
Justina Waller
Regulatory Affairs Specialist

(Appendix 1)

11. Ms. Waller received no response to this inquiry for possible dates and times. A different message was later sent by Spire to another SNGMO representative. However, that message did not include any suggestion for possible dates and times to meet. SNGMo has again followed up as of September 6, 2018. **(Appendix 1)**

WHEREFORE, SNGMO respectfully requests the Commission approve the compliance tariff sheets identified as Tariff File No. YG-2019-0024.

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

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 10th day of September, 2018, to:

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