

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

Missouri Propane Gas Association,)	
)	
Complainant,)	
v.)	Case No. GC-2016-0083
)	
Summit Natural Gas of Missouri, Inc.,)	
)	
Respondent.)	

**REQUEST FOR MEDIATION AND TO SUSPEND SCHEDULE
AND RESPONSE TO MOTION FOR LEAVE**

COMES NOW Respondent, Summit Natural Gas of Missouri, Inc. (SNGMO or Company) and, as its Request for Mediation and To Suspend Schedule and Response to Motion for Leave, states as follows to the Missouri Public Service Commission (Commission):

REQUEST FOR MEDIATION AND TO SUSPEND SCHEDULE

1. The Notice of Contested Case and Order Directing Filing issued on October 5, 2015 (Notice), provided, in part, as follows:

As an alternative to the formal evidentiary hearing procedure, the Commission offers mediation. Mediation is a voluntary process in which a neutral person assists the parties in exploring opportunities for settlement. Upon a request for mediation, the Commission may suspend the schedule set forth in this order.

2. The Notice further directed that an answer to the complaint be filed by November 4, 2015.

3. Respondent hereby requests mediation and a suspension of the date for the filing of an answer until such time as mediation can be scheduled and conducted.

RESPONSE TO MOTION FOR LEAVE

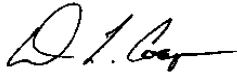
4. On October 30, 2015, the Missouri Propane Gas Association (MPGA) filed its Motion to File First Amended Complaint (Motion for Leave). Therein, MPGA sought leave of the Commission to file a First Amended Complaint.

5. SNGMO states that it has no objection to the Motion for Leave. However, given the likely amendment of MPGA's Complaint, SNGMO requests that, even if the requested mediation is not granted, SNGMO be relieved of the obligation to respond to MPGA's initial Complaint. Further, SNGMO notes that Commission Rule 4 CSR 240-2.080(18) provides that, in the absence of a suspension of the schedule in this case, SNGMO's answer to the First Amended Complaint would not be due until ten (10) days after the Motion for Leave has been granted and the First Amended Complaint deemed filed with the Commission.

WHEREFORE, SNGMO requests that the Commission issue its order directing mediation and suspending date for the filing of an answer until such time as mediation can be scheduled and conducted, and granting such further relief as the Commission should find to be reasonable and just.

Respectfully submitted,

BRYDON, SWEARENGEN & ENGLAND P.C.

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ATTORNEYS FOR SUMMIT NATURAL
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been transmitted by electronic mail to the following on this 4th day of November, 2015:

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