

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

In the Matter of )  
Summit Natural Gas of Missouri’s ) Case No. GR-2014-0096  
Purchased Gas Adjustment )

In the Matter of )  
Summit Natural Gas of Missouri’s ) Case No. GR-2014-0097  
Purchased Gas Adjustment )

**MOTION TO CONSOLIDATE**

Comes now Summit Natural Gas of Missouri, Inc. (“SNGMO” or “Company”), and, as its Motion to Consolidate Files Nos. GR-2014-0096 and GR-2014-0097, states as follows to the Missouri Public Service Commission (Commission):

1. File No. GR-2014-0096 relates to purchased gas adjustments for the former Missouri Gas Utility, Inc. (MGU) service territory of SNGMO. File No. GR-2014-0097 relates to purchased gas adjustments for the former Southern Missouri Natural Gas (SMNG) service territory of SNGMO.

2. Gas purchasing for the former MGU and SMNG is centralized and involve the same responsible corporate entity (SNGMO).

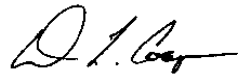
3. Commission Rule 4 CSR 240-2.110(3) states that “[w]hen pending actions involve related questions of law or fact, the commission may order a joint hearing of any or all the matters at issue, and may make other orders concerning cases before it to avoid unnecessary costs or delay.” The Commission has previously stated that Commission Rule 4 CSR 240-2.110(3) allows the Commission to consolidate pending actions involving related questions of law or fact. *See In the Matter of Highway H Utilities, Inc.*, Order Consolidating Cases, Case No. WA-2009-0316, 2009 Mo. PSC LEXIS 431 (May 19, 2009).

4. The two above-captioned files concern a review of SNGMO's gas purchasing practices. SNGMO suggests that consolidation of the two cases would further judicial economy and avoid unnecessary costs or delay.

5. Staff counsel has indicated that Staff supports the proposed consolidation.

**WHEREFORE**, SNGMO respectfully requests that the Commission consolidate Files No. GR-2014-0096 and GR-2014-0097, with GR-2014-0096 being the lead matter.

Respectfully submitted,



---

Dean L. Cooper MBE #36592  
BRYDON, SWEARENGEN & ENGLAND P.C.  
312 East Capitol Avenue  
P.O. Box 456  
Jefferson City, Missouri 65102-0456  
Telephone: (573) 635-7166  
Facsimile: (573) 635-3847  
Email: 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 7<sup>th</sup> day of October, 2014:

John Borgmeyer  
Office of the General Counsel  
[John.Borgmeyer@psc.mo.gov](mailto:John.Borgmeyer@psc.mo.gov)  
[Staffcounsel@psc.mo.gov](mailto:Staffcounsel@psc.mo.gov)

Marc Poston  
Office of the Public Counsel  
[marc.poston@ded.mo.gov](mailto:marc.poston@ded.mo.gov)  
[opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov)

