

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

In the Matter of a Motion for an Emergency)
Order Establishing a Temporary Moratorium)
On Utility Discontinuances to Protect Public)
Health and Safety by Mitigating the Spread)
of the COVID-19 Pandemic.)

Case No. AO-2021-0164

RESPONSE TO MOTION

Summit Natural Gas of Missouri, Inc. (“SNGMO”) submits its response in consideration of the Emergency Order Establishing a Temporary Moratorium on Utility Discontinuances.

SNGMO’s original suspension of disconnects was voluntarily established as an economic response to public health and safety issues. At the beginning of the pandemic, the full impacts of COVID-19 were still unclear and SNGMO needed time to implement safety protocols necessary to protect its workforce and customers. The initial suspension of disconnection activities allowed time for SNGMO to develop safe working procedures and provided customers relief when many business and employers were closed. Missouri is now approximately 9 months into the pandemic and businesses have begun to reopen and resume normal business practices.

SNGMO is aware that past due amounts incurred at the beginning of the pandemic are a challenge for some customers. SNGMO has provided 6-month payment plans during warmer months and up to 12-month payment plans from November 1st through March 31st and is prepared to help customers in need connect to other financial resources available to help overcome this challenge, like heating assistance programs. In the event of a future moratorium on disconnections, customers currently experiencing difficulties

paying utility bills will only see their past due balances increase to potentially insurmountable levels. SNGMO notes that federal funding to assist utility customers is also available to customers.

SNGMO understands that these are difficult and unprecedented times for our customers, communities and team. In considering the Emergency Moratorium, we believe it's imperative for the Commission to consider both the current and future impacts of the pandemic on customers as you make this difficult policy decision. SNGMO trusts that the Commission will do what is in the best interest of ratepayers and utilities during this difficult time.

Dated this 14th day of December 2020.

Respectfully submitted,

By:

/s/ Brooke N. South

Brooke N. South

Bar No. 66624

Corporate Counsel

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail to all parties and/or counsels of record this 14th day of December 2020.

/s/ Brooke N. South
Brooke N. South