

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

In the Matter of the Commissions Proposed Rule)
20 CSR 4240-10.155 and Proposed Rescissions of) File No. OX-2025-0104
20 CSR 4240-20.015, 40.015, 40.016, and 80.015)
Relating to Affiliate Transactions for Electrical)
Corporations, Gas Corporations, Gas Corporations)
Heating Companies, Certain Water Corporations)
and Certain Sewer Corporations)

SUMMIT NATURAL GAS OF MISSOURI’S INITIAL COMMENTS

COMES NOW Summit Natural Gas of Missouri (“Company” or “SNGMO”), and in response to the Missouri Public Service Commission's ("Commission") *Order Setting Hearings and Comment Period* filed November 15, 2024. SNGMO states as follows:

1. The Company has had the opportunity to review the proposed amendments to 20 CSR 4240-10.155 Affiliate Transactions Respecting Electrical Corporations, Gas Corporations, Heating Companies, Certain Water Corporations and Certain Sewer Corporations, and submits the following comments;

2. To further define limitations of accessibility to the books and records of a covered utility’s parent and affiliates, SNGMO recommends the following language, noted in italics below, be added to 20 CSR 4240-10.155(8)(A) Access to Records of Affiliates:

(A) To the extent permitted by applicable law and pursuant to established commission discovery procedures, a covered utility shall make available the books and records of its parent and any other affiliates when required in the application of this rule. *Access to affiliate books and records shall be limited to information reasonably required to ensure compliance with these rules and shall not extend to information unrelated to the*

affiliate's transactions with the covered utility.

3. SNGMO supports further discussion with Staff and other stakeholders around these important affiliate transaction rules.

WHEREFORE, SNGMO respectfully submits its Initial Comments.

Respectfully submitted,

/s/ Goldie T. Bockstruck

Goldie T. Bockstruck #58759

Director, Regulatory Affairs and

Regulatory Counsel

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Attorney for Summit Natural Gas of Missouri

Dated: November 27, 2024

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to the Staff of the Missouri Public Service Commission and the Office of the Public Counsel on this 27th day of November, 2024.

/s/ Goldie T. Bockstruck
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