

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

In the Matter of the Application of Summit Natural Gas of)
Missouri Inc., for Permission and Approval and a)
Certificate of Convenience and Necessity to Construct,)
Install, Own, Operate, Maintain, and Otherwise Control) File No. GA-2017-0016
and Manage a Natural Gas Distribution System to Provide)
Gas Service in various counties as an)
Expansion of its Existing Certificated Areas)

MOTION FOR LEAVE TO AMEND APPLICATION

COMES NOW Summit Natural Gas of Missouri, Inc. (“SNGMO” or the “Company”), by and through its undersigned counsel, and, for its Motion for Leave to Amend Application, respectfully states as follows to the Missouri Public Service Commission (“Commission”):

1. On July 15, 2016, SNGMO filed an Application for CCN and Request for Waiver (Application) in this file. The Application included four appendices (A, B, C, and D).

2. After further reflection, SNGMO desires to amend three of those appendices to reduce the areas for which a certificate is sought and to provide a better estimate of the revenues associated with the requested areas. For this purpose, SNGMO seeks to replace the existing Appendix A (Legal Description), Appendix B (Maps), and Appendix D (estimate of expenses and revenues) with the attached **Appendix A Amended**, **Appendix B Amended**, and **Appendix D Amended (Proprietary)**, respectively.

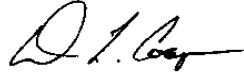
3. Commission Rule 4 CSR 240-2.080(18) provides, in part, that a pleading may be amended at any time by leave of the Commission. SNGMO asserts that the need to accurately reflect the areas being requested by SNGMO’s application constitutes good cause for a grant of leave to amend. Moreover, no responsive pleading has yet been filed in this matter. SNGMO believes that a grant of the requested leave will not prejudice the parties.

WHEREFORE, SNGMO respectfully requests that the Commission issue its order granting SNGMO leave to amend its Application as described herein.

Respectfully submitted,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:



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ATTORNEYS FOR SUMMIT NATURAL GAS
OF MISSOURI, INC.

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been sent by electronic mail this 10th day of August, 2016, to the Office of the General Counsel and the Office of the Public Counsel.

