

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

In the Matter of	)	
Summit Natural Gas of Missouri's	)	File No. GR-2014-0096
Purchased Gas Adjustment	)	as consolidated with
	)	File No. GR-2014-0097

**MOTION TO SET RESPONSE TIME PER STAFF RECOMMENDATION**

Comes now Summit Natural Gas of Missouri, Inc. ("SNGMO" or "Company"), and, as its Motion to Set Response Time Per Staff Recommendation, states as follows to the Missouri Public Service Commission (Commission):

1. On October 10, 2014, the Staff of the Commission (Staff) filed its Recommendations (and associated Memoranda) in Files Nos. GR-2014-0096 and GR-2014-0097. Among other things, the Staff Recommendations in both files requested that "the Commission issue an order requiring Summit to . . . Respond to Staff's Memorandum within 60 days."

2. On October 6, 2014, SNGMO had filed a Motion to Consolidate Files Nos. GR-2014-0096 and GR-2014-0097. That motion was granted by the Commission on October 27, 2014.

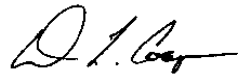
3. The Staff Recommendations contain several allegations and recommendations concerning SNGMO's gas purchasing activities. The Staff Recommendations are the result of a Staff review of SNGMO's activities that has been ongoing for approximately eleven (11) months (the first data requests associated with this matter were issued on November 18, 2013).

4. Given the the amount of material involved and the nature of the recommendations, SNGMO needs additional time to discuss and formulate its response to the Staff Recommendation. Accordingly, SNGMO moves the Commission to issue its order

providing SNGMO sixty (60) days to respond to the Staff Recommendations, consistent with Staff's request.

**WHEREFORE**, SNGMO respectfully requests that the Commission issue its order providing SNGMO sixty (60) days, or until December 9, 2014, to respond to the allegations and recommendations contained in the Staff Recommendations.

Respectfully submitted,



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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 28<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)

