

4. This situation is further complicated by the fact that SNGMO regulatory personnel were en route by automobile from West Plains, Missouri, to Gallatin, Missouri, for the Commission's local public hearings when this order was issued, and will not complete their travel until sometime tomorrow.

5. Lastly, as was discussed by the Commissioners in today's agenda meeting, this Order represents a change in approach and reasoning concerning the issue of seeking parent (and grandparent) information and responses from a subsidiary company. The Order's use of the "practical ability to obtain the information sought" standard is new to Commission cases.

6. Thus, while it may be true, as stated in the Order, that Summit has not denied that it has the practical ability to obtain the information, it is much more accurate to state that there was *no evidence presented, requested or received by the Commission* at its oral argument as to SNGMO's "practical ability." Neither Staff's Pleading nor its oral argument alleged that such "practical ability" exists and the subject did not come up during the oral argument. Accordingly, SNGMO further seeks an extension so that it may present a motion for reconsideration concerning this subject.

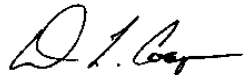
7. SNGMO requests that the Commission extend the date by which it requires SNGMO to respond to the subject data requests until July 15, 2014. Such extension would provide the time for the Commission to address SNGMO's motion for reconsideration; for SNGMO, if necessary, to attempt to determine responses to the requests; and, for Staff to make use of any such responses in its Surrebuttal testimony.

8. SNGMO moves for expedited treatment because the one (1) day provided between the issuance of the Order and the required compliance date does not allow for the Commission's normal motion response times. A grant of the Motion for Expedited Treatment is

consistent with the public interest as it will allow the Commission to consider and address the issues raised by the Order, without creating prejudice to the parties at this point in the litigation. This Motion has been filed as soon as possible after the receipt of the Order Granting Motion to Compel (in fact, within 6 hours of its issuance).

WHEREFORE, SNGMO respectfully requests that the Commission grant its Motion for Expedited Treatment and grant it an extension of time until July 15, 2014, to respond to the data requests that are the subject of the Order Granting Motion to Compel.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 19th day of June, 2014, to:

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