

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

In the Matter of)
Summit Natural Gas of Missouri, Inc.’s) Case No. GR-2015-0101
Purchased Gas Adjustment)

In the Matter of)
Summit Natural Gas of Missouri, Inc.’s) Case No. GR-2015-0102
Purchased Gas Adjustment)

MOTION TO CONSOLIDATE

Comes now Summit Natural Gas of Missouri, Inc. (“SNGMO” or “Company”), and, as its Motion to Consolidate Files Nos. GR-2015-0101 and GR-2015-0102, states as follows to the Missouri Public Service Commission (Commission):

1. File No. GR-2015-0101 relates to purchased gas adjustments for the former Missouri Gas Utility, Inc. (MGU) service territory of SNGMO. File No. GR-2015-0102 relates to purchased gas adjustments for the former Southern Missouri Natural Gas (SMNG) service territory of SNGMO.

2. Gas purchasing for the former MGU and SMNG is centralized and involve the same responsible corporate entity (SNGMO).

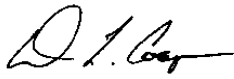
3. Commission Rule 4 CSR 240-2.110(3) states that “[w]hen pending actions involve related questions of law or fact, the commission may order a joint hearing of any or all the matters at issue, and may make other orders concerning cases before it to avoid unnecessary costs or delay.” The Commission has previously stated that Commission Rule 4 CSR 240-2.110(3) allows the Commission to consolidate pending actions involving related questions of law or fact. *See In the Matter of Highway H Utilities, Inc., Order Consolidating Cases*, Case No. WA-2009-0316, 2009 Mo. PSC LEXIS 431 (May 19, 2009).

4. The two above-captioned files concern a review of SNGMO's gas purchasing practices. SNGMO suggests that consolidation of the two cases would further judicial economy and avoid unnecessary costs or delay.

5. Staff counsel has indicated that Staff supports the proposed consolidation.

WHEREFORE, SNGMO respectfully requests that the Commission consolidate Files No. GR-2015-0101 and GR-2015-0102, with GR-2015-0101 being the lead matter.

Respectfully submitted,



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ATTORNEYS FOR SUMMIT NATURAL GAS
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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 the following counsel this 2nd day of December, 2014:

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