

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

In the Matter of the Application of Summit )  
Natural Gas of Missouri, Inc. for Approval )  
Of Its Cost Allocation Manual )

**Case No. GO-2012-0322**

**STATUS REPORT AND MOTION TO DISMISS**

**COME NOW** the Staff of the Missouri Public Service Commission (“Staff”), by and through the Staff Counsel’s Office, and on behalf of all the parties herein, hereby files its *Status Report and Motion to Dismiss* pursuant to the Commission’s April 11, 2025, *Order Further Staying Proceedings and Ordering Status Report*. In support thereof, Staff states as follows:

**Status:**

1. On August 26, 2019, Staff and Summit Natural Gas of Missouri (“SNGMO”) filed a *Joint Motion to Stay Proceeding*. A procedural schedule had been set in the instant case to address a new Cost Allocation Manual (“CAM”). Staff and SNGMO proposed staying the instant proceeding because Case No. AW-2018-0394 would likely result in the initiation by the Commission of a formal rulemaking under Chapter 536, RSMo., regarding changes to the Affiliate Transactions Rule (“ATR”). On August 28, 2019, the Office of the Public Counsel (“OPC”) filed its *Response of the Office of the Public Counsel to the Joint Motion to Stay Proceeding*. With qualifications, OPC did not object to a stay of the proceedings.

2. On November 6, 2019, in Case No. AW-2018-0394, Staff submitted a red-lined version of its revised draft ATR with explanations for each individual change. On November 7, 2019, the Commission issued its *Order Requesting Additional*

*Responses*, and on December 9, 2019, interested stakeholders submitted further comments.

3. On February 18, 2020, Staff filed its *Notice of Third Draft of Affiliate Transactions and HVAC Affiliate Services Rules*, in which it indicated that it believes its most recent version is ready to proceed towards the formal rulemaking process. In addition, Staff requested that the Commission issue an order or notice inviting interested stakeholders to file comments as to the costs of implementing Staff's proposed rules. The Commission did so on February 26, 2020. Since then, the Parties have filed status reports on March 2, 2020, June 8, 2020, September 11, 2020, December 11, 2020, March 12, 2021, July 12, 2021, October 12, 2021, January 12, 2022, April 12, 2023, April 8, 2024, and April 7, 2025. On April 11, 2025, the Commission issued its *Order Further Staying Proceedings and Ordering Status Report* to be filed no later than April 13, 2026.

4. On March 5, 2026, Workshop Case Nos. AW-2018-0394 and AW-2018-0393 were closed by the Commission due to the rulemaking cases (OX-2025-0104; OX-2025-0105; and OX-2025-0106) being approved and finalized. These cases progressed into new affiliate transaction rules that have been fully approved, published in the Code of State Regulations ("CSR's") on April 30, 2025, and became effective on May 30, 2025. These new rules are as follows: 20 CSR 4240-10.155 (Affiliate Transactions); 20 CSR 4240-10.165 (HVAC Services Affiliate Transaction); and 20 CSR 4240-10.175 (Customer Information).

**Motion to Dismiss:**

5. Section (5)(B) of the new Affiliate Transaction Rule requires the Company to file a CAM for approval in its first general rate case after May 30, 2025, or within two years after the effective date. The required CAM will be developed in compliance with the new ATR, which reflects material changes from the prior ATR.

6. SNGMO will be filing an application for approval of the Company's CAM in compliance with the guidelines set forth under the new rules addressed above.<sup>1</sup> Given the need for an application and new CAM to be filed in accordance with the new ATR, there is no longer a need to pursue this case.

7. The parties previously filed testimony in this matter. Commission Rule 20 CSR 4240-2.116(1) states that once prepared testimony has been filed, a proceeding may only be dismissed by leave of the Commission.

8. The foregoing facts and circumstances demonstrate that there is good cause to dismiss this case, since its original purpose will be served by new proceedings when the Company files its updated CAM, as required by the new ATR. Thus, the parties request that the Commission dismiss this proceeding.

9. The Commission reached a similar decision in its *Order Dismissing Case In the Matter of a Union Electric Company d/b/a Ameren Missouri's Cost Allocation Manual (CAM)*, File No. EO-2017-0176 (July 9, 2025), a CAM case that had been similarly stayed awaiting the result of the Commission's affiliate transaction rulemaking.

---

<sup>1</sup> As it has previously stated, SNGMO is not conducting affiliate transactions that may impact the Company's Purchased Gas Adjustment or its Actual Cost Adjustment.

**WHEREFORE**, Staff prays the Commission will accept its April 13, 2026, *Status Report and Motion to Dismiss*, dismiss this matter for the reasons stated, and for such other relief that is deemed proper under the circumstances.

Respectfully submitted,

**/s/ J. Scott Stacey**

J. Scott Stacey  
Deputy Counsel  
Missouri Bar No. 59027  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102  
573-522-6279  
573-751-9285 (Fax)  
[scott.stacey@psc.mo.gov](mailto:scott.stacey@psc.mo.gov)

**ATTORNEY FOR STAFF OF THE  
PUBLIC SERVICE COMMISSION**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing has been served, by hand delivery, electronic mail, or First Class United States Mail, postage prepaid, to all parties of record on the Service List maintained for this case by the Data Center of the Missouri Public Service Commission, on this **13<sup>th</sup> day of April, 2026**.

**/s/ J. Scott Stacey**