DEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Missouri Propane Gas Association,)
Complainant,)
V.) <u>File No. GC-2016-0083</u>
Summit Natural Gas of Missouri, Inc.,)
Respondent.)

MOTION FOR EXTENSION OF TIME WITHIN WHICH TO COMPLETE INVESTIGATION

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission, by and through counsel, and for its *Motion for Extension of Time Within Which to Complete Investigation*, states as follows:

- 1. Missouri Propane Gas Association ("MPGA") filed a complaint against Summit Natural Gas of Missouri, Inc. ("Summit") on October 2, 2015.
- 2. Thereafter the Commission ordered Staff to investigate and file a report no later than November 18, 2015.
- 3. On November 4, 2015, Summit requested mediation and suspension of the procedural schedule that the Commission granted on November 17, 2015.
- 4. MPGA, Summit, and Staff participated in mediation sessions, but the parties were unable to resolve all disputed issues through mediation.
- 5. On April 25, 2016, the Commission set new deadlines, and required Staff to file a report no later than May 20, 2016. This new deadline granted Staff only 25 days to conduct discovery and file its investigative report.

- 6. Staff sent out data requests on April 26, 2016 and April 27, 2016. Staff has not received all of the responses to those data requests. Further, based on the responses Staff has received, Staff needs additional time to conduct further investigation.
- 7. Staff requests additional time within which to complete its investigation and file its report. All parties have stated that they support Staff's request for additional time.
- 8. MPGA, Summit, Office of the Public Counsel, and Staff are currently working together to provide the Commission with a proposed procedural schedule in this matter. At this time it is anticipated that the forthcoming, jointly filed procedural schedule proposal will specify a date upon which Staff will file its report.

WHEREFORE, Staff prays that the Commission will grant it additional time within which to complete its investigation and file its report; and such other and further relief as the Commission deems just in the circumstances.

Respectfully submitted,

/s/ Jamie S. Myers

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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 17th day of May, 2016.

/s/ Jamie S. Myers