

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

In the Matter of the Application of Summit Natural Gas of)	
Missouri Inc., for Permission and Approval and a)	
Certificate of Convenience and Necessity to Construct,)	
Install, Own, Operate, Maintain, and Otherwise Control)	<u>File No. GA-2018-0220</u>
and Manage a Natural Gas Distribution System to Provide)	
Gas Service in Daviess County as an Expansion of its)	
Existing Certificated Areas)	

MOTION FOR EXTENSION OF TIME TO FILE STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), and files its *Motion For Extension Of Time To File Staff Recommendation*. In support thereof, the Staff states as follows:

1. On February 8, 2018, Summit Natural Gas of Missouri, Inc. ("Summit" or the "Company"), submitted its *Application for CCN and Request for Waiver*, requesting permission and approval and a certificate of convenience and necessity ("CCN") to construct, install, own, operate, maintain, and otherwise control and manage a natural gas distribution system to provide gas service in Daviess County, Missouri, as a further expansion of its existing certificated area ("Application"). The Application also contained a request to waive the sixty (60) day notice requirement of Commission Rule 4 CSR 240-4.017(1).

2. In its February 9, 2018, *Notice and Order Directing Filing*, the Commission ordered an intervention deadline of March 12, 2018, and directed Staff to file a recommendation on the application no later than March 26, 2018.

3. In an attempt to provide its recommendation by March 26, 2018, Staff requested three (3) data requests (DRs). Staff received responses from the company for two of the three DRs on March 20, 2018. The remaining DR is due March 28, 2018.

However, Staff believes it necessary to review additional information prior to preparing and filing its recommendation in this matter.

4. Summit's requested CCN would allow it to serve a development known as Lake Viking in Caldwell and Daviess Counties. To serve these areas, Summit will need to extend its facilities from the city of Gallatin, Missouri several miles to Lake Viking. Along with its Application, Summit submitted a study for the proposed extension of its system; however, Staff is interested in reviewing a current or historical study of the Gallatin/Hamilton system that would allow a better understanding of the potential impact of Summit's estimated customer additions on the regional system. Further, Staff has interest in reviewing Summit's plans regarding ANR pipeline¹ capacity for this portion of its system. Staff understands that even without the requested addition, the existing Summit transportation capacity at the ANR interconnect for the Gallatin/Hamilton system is approaching its stated design capacity.

5. Staff's interest in this project is amplified by the Commission's January 17, 2018, investigation of Summit's interruption of gas deliveries in the Lebanon, Missouri region.² This investigation surrounds interruption of service in early January 2018 to certain Summit transportation customers, and operational problems for some of Summit's other customers in the form of low pressure service. Staff filed its *Preliminary Report* into the matter on March 21, 2018, and while it concluded that Summit did not violate any statutes, regulations, or tariffs, Staff did have recommendations related to Summit's operations in the Lebanon area.

¹ ANR Pipeline is the natural gas supplier from which Summit procures gas for this Gallatin/Hamilton system.

² Case No. GO-2018-0195.

6. Summit currently serves approximately 1,320 residential customers in the Gallatin/Hamilton region. While Staff has no reason at this time to believe the requested addition to Summit's system could result in service quality issues to the region, up to this point Staff has not reviewed the requisite information to dissuade any concern.

7. In order to perform a thorough analysis of the proposed addition to Summit's system, Staff requires confirmation of ANR capacity, evidence of economic supply, and needs to review distribution capability with and without interruptible transportation load. While this analysis is more in depth than typically required, Staff believes the characteristics of Summit's system justify the added scrutiny.

8. Due to Staff's belief that a deeper review is necessary for this project, Staff requests an additional sixty (60) days in which to request and analyze additional information. However, Staff recognizes the Company's wish to complete its project in a timely manner. Therefore, Staff will endeavor to complete its review as timely as possible, contingent of course on the speed at which the Company can provide Staff the information it deems necessary for completion of its review.

WHEREFORE Staff moves the Commission issue an order granting Staff until May 22, 2018, to file its recommendation on Summit's Application this matter.

Respectfully submitted,

/s/ Ron Irving

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile, or electronically mailed to all counsel of record this 23rd day of March, 2018.

/s/ Ron Irving