

**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) File No. GO-2012-0322
Of Its Cost Allocation Manual.)

JOINT MOTION TO STAY PROCEEDING

COME NOW Summit Natural Gas of Missouri, Inc. (“SNGMo” or “Company”) and the Staff of the Missouri Public Service Commission (“Staff”), and, as their Joint Motion to Stay Proceeding, respectfully state as follows to the Missouri Public Service Commission (“Commission”):

1. This case concerns SNGMo’s application for approval of a Coast Allocation Manual (“CAM”), pursuant to Commission Rule 4 CSR 240-40.015.

2. A procedural schedule was previously ordered on June 7, 2019. In accordance with that procedural schedule, the parties have filed direct, rebuttal and surrebuttal testimony. An evidentiary hearing is currently scheduled for September 9-10, 2019. Prior to the hearing, the parties will be required to file a list of issues (August 29) and statements of position (September 3). Subsequent to the hearing, the parties will be required to file initial and reply briefs (October 1 and October 15, respectively).

3. Currently, the Commission has Affiliate Transactions Rules applicable to electric, gas (with and without gas marketing operations), heating utilities, and HVAC services affiliates.

4. On June 27, 2018, the Staff filed a motion to open a working docket (which became File No. AW-2018-0394) indicating that the Staff was of the opinion that “there is, among other things, an opportunity to make the Commission’s rules easier to use” and also indicating the Staff’s belief that the seven different rules in place at the present time should be consolidated into three rules (one rule applicable to electric, gas, gas marketing, heating, and

larger water and sewer corporations; one for smaller water and sewer corporations; and one for HVAC services affiliates). The approach taken by Staff's motion potentially may apply the same rules (or whatever terms are ultimately decided on by the Commission) to the electric, gas (with and without gas marketing operations), larger water, and larger sewer corporations operating in the state, including Ameren Missouri, Kansas City Power & Light Company and KCPL Greater Missouri Operations Company, The Empire District Electric Company, Spire Missouri, Liberty Utilities, and Missouri-American Water Company, as well as SNGMo. Since opening the workshop docket, Staff has collected comments from stakeholders about the above-referenced draft Affiliate Transactions Rules it prepared and submitted them in that working docket and conducted a workshop.

5. On June 4, 2019, the Office of the Public Counsel ("OPC") filed a petition asking the Commission to promulgate an Affiliate Transactions Rule applicable to water and sewer corporations, expressing concern about the pace of progress of getting such Affiliate Transactions Rule in place. The Commission denied OPC's rulemaking petition, but established a deadline of September 16, 2019, for Staff to file a draft rule for the Commission's consideration. Staff will file such a rule in File No. AW-2018-0394, by the deadline established by the Commission.

6. Once a proceeding on the Affiliate Transactions Rules is concluded, it is likely that there will be an updated and common set of Rules, which one can reasonably expect to contain differences from the current electric, gas (with and without gas marketing operations), and heating rules that are in place, on which CAMs can then be based (and upon which any need for variances will need to be assessed).

7. SNGMo witness Birchfield recognizes in his Surrebuttal Testimony that the current Affiliates Transaction Rules continue to be in place and apply to SNGMo's affiliate transactions.

8. The Company and Staff agree that staying this proceeding as requested herein does not prejudice any party but rather improves the opportunity for all potentially impacted utilities and those utilities' stakeholders to fully participate in both the workshop process and in the formal rulemaking that is likely to follow. Further, the Movants note that a similar motion to stay has been granted in File No. EO-2017-0176 (*In the Matter of Union Electric Company d/b/a Ameren Missouri's Cost Allocation Manual (CAM)*).

9. This Motion has been discussed with Counsel for the OPC and it is Movants' understanding that OPC will file a response stating its non-objection to this Motion.

WHEREFORE, SNGMo and Staff request that the Commission stay further proceedings in this docket until completion of the File No. AW-2018-0394 workshop docket and, ultimately, a formal rulemaking respecting Affiliate Transactions Rules.

Respectfully submitted,



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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 26th day of August, 2019:

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