

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

In the Matter of the Application of Summit Natural)	
Gas of Missouri, Inc., for Authority to Amend its)	
Existing Credit Agreement and to Extend the Term)	<u>File No. GF-2016-0095</u>
of its Outstanding Secured Indebtedness of)	
\$100,000,000 with the Issuance of a New Note)	
Having More Favorable Interest Rates)	

STAFF RESPONSE TO ORDER DIRECTING PLEADING

COMES NOW the Staff of the Missouri Public Service Commission, by and through the undersigned counsel, and respectfully states as follows:

1. On October 23, 2015, the Commission issued an *Order Directing Staff to File a Pleading Stating When It Will File a Recommendation* ("Order"). In the Order, the Commission stated that Summit Natural Gas of Missouri, Inc. ("Company") "has requested expedited treatment of this matter and Commission action by December 19, 2015" and ordered Staff to "file a pleading stating when it anticipates filing its recommendation in this matter" no later than October 30, 2015.

2. Given that the Company has requested expedited treatment of this matter, Staff would hope that the Company will respond to any discovery requests herein in an expedited manner. Assuming that the Company responds to all discovery requests herein expeditiously, fully and completely, Staff anticipates filing its recommendation in this matter no later than December 4, 2015, which would allow for two (2) regular Commission agenda meetings after the filing of the Staff recommendation and before the requested Commission-action date of December 19, 2015.

WHEREFORE, Staff respectfully submits this response to the Commission's *Order Directing Staff to File a Pleading Stating When It Will File a Recommendation* and requests the Commission issue such orders herein as the Commission deems appropriate.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record this 30th day of October, 2015.

/s/ Jeffrey A. Keevil