

**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)

File No. GO-2012-0322

STATUS REPORT

COME NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through the Staff Counsel’s Office, Summit Natural Gas of Missouri, Inc., (“SNGMo”), and the Office of the Public Counsel (“Public Counsel”)(collectively “the Parties”) and hereby file their *Status Report* pursuant to the Commission’s November 15, 2019, *Order Further Staying Proceedings and Ordering Status Report*. In support thereof, the Parties state as follows:

1. On August 26, 2019, Staff and 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 File No. AW-2018-0394 will 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, Public Counsel filed its Response of the Office of the Public Counsel to the Joint Motion to Stay Proceeding. With qualifications, Public Counsel did not object to a stay of the proceedings.

2. On November 6, 2019, in File 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, ordering any stakeholder wishing to offer comments regarding the costs that may be incurred to comply with Staff's draft rules to do so by March 20, 2020. As such, the Parties still believe the best course remains pursuing the ATR rulemaking and staying the SNGMo CAM proceeding in the interim.

WHEREFORE Staff, SNGMo, and Public Counsel pray the Commission will accept their March 2, 2020, Status Report.

Respectfully submitted,

/s/ Mark Johnson

Mark Johnson, Mo. Bar No. 64940
Deputy Counsel
P.O Box 360
Jefferson City, Missouri 65102
Phone: (573) 751-7431
Fax: (573) 751-9285
E-mail: mark.johnson@psc.mo.gov

**Attorney for the Staff of the
Missouri Public Service Commission**

/s/ Dean L. Cooper

Dean L. Cooper, Mo. Bar No. 36592
BRYDON, SWEARENGEN &
ENGLAND P.C.
312 East Capital Avenue
P.O. Box 456
Jefferson City, MO 65102-0456
Phone: (573) 635-7166
E-mail: dcooper@brydonlaw.com

**Attorney for Summit Natural Gas of
Missouri, Inc.**

/s/ Lera Shemwell

Lera Shemwell (#43792)

Senior Counsel

P.O. Box 2230

Jefferson City, MO 65102

Telephone: (573) 751-5565

Facsimile: (573) 751-5562

E-mail: Lera.shemwell@opc.mo.gov

**Attorney for the
Office of the Public Counsel**

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 2nd day of March 2020.

/s/ Mark Johnson