

Missouri Public Service Commission**Respond Data Request**

Data Request No.	0003
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	8/29/2012
Issue	General Information and Miscellaneous - Affiliated Transactions
Requested From	Michelle A Moorman
Requested By	Anne Allee
Brief Description	"incidental services"
Description	The CAAM references "Incidental Services" on pages II-1 and II-3. Please specify whether Summit has performed incidental services for its affiliates from September 2011 to present. If yes, please provide a detailed description of the incidental services provided and the revenues associated with the service.
Response	Summit Natural Gas has not performed incidental services for its affiliates from September 2011 to present. Response provided by: Michelle Moorman
Objections	NA

The attached information provided to **Missouri Public Service Commission** Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the **Missouri Public Service Commission** if, during the pendency of Case No. **GO-2012-0322** before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the **Summit Natural Gas of Missouri, Inc.-Investor(Gas)** office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to **Summit Natural Gas of Missouri, Inc.-Investor(Gas)** and its employees, contractors, agents or others employed by or acting in its behalf.

Security :	Public
Rationale :	NA

Missouri Public Service Commission

Data Request

Data Request No.	0005
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	6/10/2016
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah Ahrendt
Requested By	Steve Dottheim
Brief Description	Listing of Affiliates of SNGMO
Description	Please provide a current listing of all "affiliates" (as that term is defined in the Missouri Commission's Affiliate Transactions Rule, 4 CSR 240-20.015) of Summit Natural Gas of Missouri ("SNGMO"), with a short description of each affiliate's primary business purposes. Also, indicate for each affiliate whether it offers regulated or unregulated goods/services, or both; whether the affiliate is currently active or inactive; the percentage of common ownership of each affiliate with SNGMO; and whether the affiliate participates in exchanges of goods and services with SNGMO. * DR requested by Mark Oligschlaeger (mark.oligschlaeger@psc.mo.gov)
Due Date	7/10/2016

The attached information provided to Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. GO-2012-0322 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

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Investor(Gas) office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to Summit Natural Gas of Missouri, Inc.- Investor(Gas) and its employees, contractors, agents or others employed by or acting in its behalf.

Summit Utilities, Inc.: The non-regulated, investor owned parent utility company. This company is currently active and does exchange goods/services with SNGMO.

Summit Natural Gas of Missouri, Inc.: The regulated natural gas distribution utility providing services within Missouri. This company is active.

Summit Natural Gas of Maine, Inc.: The regulated natural gas distribution utility providing services within Maine. This company is active and does exchange goods/services with SNGMO.

Colorado Natural Gas, Inc.: The regulated natural gas distribution utility providing services within Colorado. This company is active and does exchange goods/services with SNGMO.

Summit Utilities Management Services, LLC: A non-regulated construction management and operations services company that specializes in natural gas distribution. This company is currently active and does not exchange goods/services with SNGMO.

Wolf Creek Energy, LLC: The non-regulated transportation company providing gas marketing services within Colorado. This company is currently active and does not exchange goods/services with SNGMO.

Natural Gas Conversion Company, LLC: The non-regulated natural gas conversion company providing conversion services to Maine customers. This company is currently active and does not exchange goods/services with SNGMO.

Response by Hannah Ahrendt

Missouri Public Service Commission

Respond Data Request

Data Request No.	0004
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	8/30/2012
Issue	General Information and Miscellaneous - Affiliated Transactions
Requested From	Michelle A Moorman
Requested By	Anne Allee
Brief Description	marketing affiliate
Description	Does Wolf Creek Energy, LLC currently provide natural gas services to Summit Natural Gas and/or to other customers in Missouri? Does Summit Utilities currently have plans for Wolf Creek Energy to provide services to Summit Natural Gas and/or other customers in Missouri?
Response	Wolf Creek Energy, LLC does not provide natural gas services to Summit Natural Gas or any customers in Missouri. There are currently no plans for Wolf Creek Energy, LLC to provide those services. Response provided by: Michelle Moorman
Objections	NA

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Security :	Public
Rationale :	NA

Missouri Public Service Commission

Data Request

Data Request No.	0007
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	6/10/2016
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah Ahrendt
Requested By	Steve Dottheim
Brief Description	List of Types of Goods/Services Received or Provided by SNGMO From/To Affiliates
Description	For the years 2012 - 2016, please provide a listing of all types of goods and services either received by SNGMO from an affiliated entity, or provided by SNGMO to an affiliated entity, to which SNGMO has applied the "asymmetric pricing tests" required within the Missouri Commission Affiliate Transactions Rule under Section 4 CSR 240-20.015(2)(A). For each category of good or service listed, also provide a copy of any written agreements governing provision or procurement of the good/service between SNGMO and the affiliated entity. * DR requested by Mark Oligschlaeger (mark.oligschlaeger@psc.mo.gov)
Due Date	6/30/2016

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**Security
Rationale**

**Public
NA**

Response:

Section IX of the CAAM submitted by Summit Natural Gas of Missouri (SNGMO) in 2012 provides a listing of the types of services provided by the parent company (Summit Utilities, Inc.) to all subsidiaries including SNGMO. The overview paragraph should be modified to include in the list of services Business Systems, Treasury, Investor Relations, Risk Management, Strategy, and Business Development. Table D should be amended to exclude Shareholder Services as SNGMO is not publicly traded. Any references to CNG Holding Company as the parent company of SNGMO should be replaced with Summit Utilities, Inc.

With regard to the billing of overheads and indirects, the Distrigas formula is only used for parent allocations and not across affiliated sister companies. Non-direct parent company expenses include labor, taxes, vehicle, and other common expenses. A 15% non-allocable officer amount is not excluded from the allocation; this portion of the original CAAM should be stricken. Officers do, however, record a portion of their time to corporate governance which is considered non-allocable. The labor associated with corporate governance fluctuates from month to month. Removing actual corporate governance time as applicable for the month yields a more accurate allocation than removing a flat 15% without regard for actual time spent.

Beginning in 2015, Summit's affiliated sister companies began providing support services to each other in an effort to leverage expertise across the company. These services include construction management, operational leadership, engineering, GIS, and project accounting. These services are performed by SNGMO employees on behalf of affiliated companies and performed by affiliated companies on behalf of SNGMO. The salaries and taxes associated with these services are charged as applicable to the affiliated company at cost with no associated markup.

Response by: Laurie Rydwell, Corporate Controller

Missouri Public Service Commission

Data Request

Data Request No.	0008
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	6/10/2016
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah Ahrendt
Requested By	Steve Dottheim
Brief Description	Competitive Bidding Process

Description Regarding all categories of goods and services received by SNGMO from affiliated entities since 2012, which goods and services were received only after a competitive bidding process for the good/service in question was conducted by SNGMO? For any category of goods and services received by SNGMO from an affiliated entity from 2012 forward in the absence of an ongoing competitive bidding process, please explain why a competitive bidding process was not used by SNGMO to aid in obtaining the good/service at the lowest reasonable cost. * DR requested by Mark Oligschlaeger (mark.oligschlaeger@psc.mo.gov)

Due Date 6/30/2016

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**Security
Rationale**

**Public
NA**

Response:

Summit Natural Gas of Missouri (SNGMO) did not receive goods nor services from an affiliated entity through a competitive bidding process from 2012 until current. Materials (goods) are infrequently transferred between affiliated entities. In the event of a transfer, the item is transferred at the original purchase price plus shipping. Materials purchased from non-affiliated entities are subject to a competitive bidding process when the company deems the purchase significant enough to warrant the cost of conducting the bidding process. When possible, materials are purchased direct from the manufacturer to avoid distribution costs and markup. Since materials are originally purchased in this manner, the transfer of goods between affiliated companies at cost ensures that the company receiving the goods receives them at a market-based cost.

Services between affiliates are charged to the receiving company at the cost of salaries and taxes with no associated markup. The majority of services exchanged between affiliated entities are related to administrative support services. Utilizing central support services allows the company to take advantage of economies of scale at the consolidated level. This method ensures affiliates are receiving the lowest possible costs for the services provided and negates the need for a competitive bidding process.

Response by: Troy Palmer, Director of Procurement and Laurie Rydwell, Corporate Controller

Missouri Public Service Commission

Data Request

Data Request No.	0009
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	6/10/2016
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah Ahrendt
Requested By	Steve Dottheim
Brief Description	Expense Loadings in SNGMO's Application of FDC
Description	Please provide a listing of all expense "loadings" (for example: paid absence loading, materials and supplies loading, etc.) currently used by SNGMO in its application of the fully distributed cost ("FDC") test for pricing of affiliated services within the Missouri Commission Affiliate Transaction Rule at Section 4 CSR 240-20.015(2)(A). * DR requested by Mark Oligschlaeger (mark.oligschlaeger@psc.mo.gov)
Due Date	6/30/2016

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Security Public

Rationale

NA

Response:

With regard to the billing of overheads and indirects, the Distringas formula is only used for parent allocations and not across affiliated sister companies. Non-direct parent company expenses include labor, taxes, vehicle, and other common expenses. The Distringas formula allocates a portion of Summit Utilities, Inc. labor, burdens, benefits, vehicle, and miscellaneous expenses to each subsidiary in proportion to each company's direct labor, capital investment, and net revenues.

Beginning in 2015, Summit's affiliated sister companies began providing support services to each other in an effort to leverage expertise across the company. These services include construction management, operational leadership, engineering, GIS, and project accounting. These services are performed by SNGMO employees on behalf of affiliated companies and performed by affiliated companies on behalf of SNGMO. The salaries and taxes associated with these services are charged as applicable to the affiliated company at cost with no associated markup.

Response by: Laurie Rydwell, Corporate Controller

Missouri Public Service Commission

Data Request

Data Request No.	0010
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	6/10/2016
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah Ahrendt
Requested By	Steve Dottheim
Brief Description	SNGMO Internal Policies and Procedures Used to Determine FDC and FMC Valuations
Description	Please provide a copy of all internal policies and guidelines currently used by SNGMO to determine appropriate calculation of fully distributed cost and fair market price ("FMC") valuations required in Section 4 CSR 240-20.015(2)(A) of the Missouri Commission's Affiliate Transactions Rule. * DR requested by Mark Oligschlaeger (mark.oligschlaeger@psc.mo.gov)
Due Date	6/30/2016

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Response:

With regard to the billing of overheads and indirects, the Distringas formula is only used for parent allocations and not across affiliated sister companies. Non-direct parent company expenses include labor, taxes, vehicle, and other common expenses. The Distringas formula allocates a portion of Summit Utilities, Inc. labor, burdens, benefits, vehicle, and miscellaneous expenses to each subsidiary in proportion to each company's direct labor, capital investment, and net revenues.

Beginning in 2015, Summit's affiliated sister companies began providing support services to each other in an effort to leverage expertise across the company. These services include construction management, operational leadership, engineering, GIS, and project accounting. These services are performed by SNGMO employees on behalf of affiliated companies and performed by affiliated companies on behalf of SNGMO. The salaries and taxes associated with these services are charged as applicable to the affiliated company at cost with no associated markup.

Response by: Laurie Rydwell, Corporate Controller

Missouri Public Service Commission

Data Request

Data Request No.	0011
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	6/10/2016
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah Ahrendt
Requested By	Steve Dottheim
Brief Description	Listing of All Corporate Support Services Currently Provided to SNGMO
Description	Please provide a listing of all corporate support services currently provided to SNGMO by its parent, SUI, or other affiliate. If the listing has not changed from the one provided as part of SNG's CAM submission in Case No. GO-2012-0322 in March 2012, please so indicate. * DR requested by Mark Oligschlaeger (mark.oligschlaeger@psc.mo.gov)
Due Date	6/30/2016

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Security Public

Rationale

NA

Response:

Section IX of the CAAM submitted by Summit Natural Gas of Missouri (SNGMO) in 2012 provides a listing of the types of services provided by the parent company (Summit Utilities, Inc.) to all subsidiaries including SNGMO. The overview paragraph should be modified to include in the list of services Business Systems, Treasury, Investor Relations, Risk Management, Strategy, and Business Development. Table D should be amended to exclude Shareholder Services as SNGMO is not publicly traded. Any references to CNG Holding Company as the parent company of SNGMO should be replaced with Summit Utilities, Inc.

Beginning in 2015, Summit's affiliated sister companies began providing support services to each other in an effort to leverage expertise across the company. These services include construction management, operational leadership, engineering, GIS, and project accounting. These services are performed by SNGMO employees on behalf of affiliated companies and performed by affiliated companies on behalf of SNGMO. The salaries and taxes associated with these services are charged as applicable to the affiliated company at cost with no associated markup.

Response by: Laurie Rydwell, Corporate Controller

Missouri Public Service Commission

Data Request

Data Request No.	0012
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	6/10/2016
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah Ahrendt
Requested By	Steve Dottheim
Brief Description	Listing of All Allocation Methodologies Currently Used to Allocate Common or Corporate Costs to SNGM
Description	Please provide a listing of all allocation methodologies currently used to allocate common or corporate costs to SNGMO and other SUI affiliates, in the same or similar format as shown in Section VIII of SNGMO's CAM document filed with the Commission in Case No. GO-2012-0322 in March 2012. If the listing has not changed from the one provided as part of SNGMO's March 2012 submission, please so indicate. * DR requested by Mark Oligschlaeger (mark.oligschlaeger@psc.mo.gov)
Due Date	6/30/2016

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**Security
Rationale**

**Public
NA**

Response:

Allocation methodologies included in Section VIII of Summit Natural Gas of Missouri's (SNGMO) 2012 CAAM submission remain unchanged. These allocations are performed as a part of the rate case process and are not performed monthly as a part of SNGMO's financial statement reporting process.

Response by: Laurie Rydwell, Corporate Controller

Missouri Public Service Commission

Data Request

Data Request No.	0013
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	6/10/2016
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah Ahrendt
Requested By	Steve Dottheim
Brief Description	Listing of All "Incidental Services" Currently Offered by SNGMO
Description	Please provide a listing of all "incidental services" currently offered by SNGMO, with a brief description of the nature of the service. * DR requested by Mark Oligschlaeger (mark.oligschlaeger@psc.mo.gov)
Due Date	6/30/2016

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Security	Public
Rationale	NA

Response:

Summit Natural Gas of Missouri (SNGMO) does not offer any "incidental services" at this time.

Response by: Stacey Alvarez, Principal Regulatory Accountant

Missouri Public Service Commission

Respond Data Request

Data Request No.	0014
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	8/23/2016
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Michelle A Moorman
Requested By	Steve Dottheim
Brief Description	Transfers of Costs
Description	Please provide an update of the Affiliate Transaction Report Materials Transfers filed in BAFT-2016-1203 for January through June 2016. Data Request submitted by Amanda McMellen (amanda.mcmellen@psc.mo.gov).
Response	Please see the attached spreadsheet (Summit Affiliate Transaction Report Material Transfer 1-1-16 thru Current).
Objections	NA

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Security :	Public
Rationale :	NA

Data Request No. 0014
Company Name Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No. GO-2012-0322
Date Requested 8/23/2016
Issue General Information & Miscellaneous - Affiliated Transactions
Requested From Michelle A Moorman
Requested By Steve Dottheim
Brief Description Transfers of Costs

Description Please provide an update of the Affiliate Transaction Report Materials Transfers filed in BAFT-2016-1203 for January through June 2016.

Data Request submitted by Amanda McMellen
(amanda.mcmellen@psc.mo.gov).

Due Date 9/12/2016

Answer: Please see the attached spreadsheet (*Summit Affiliate Transaction Report Material Transfer 1-1-16 thru Current*).

Answer provided by Troy Palmer.

GO-2012-0322 DR#0014

Item	Description	Date	Location TRANSFERRED FROM	Ship/TRANSFER To Location	Quantity	Units	Amount	Charge Code
20008	METER AMERICAN AL 800	Feb-19-2016	COEA	COTE	-1	EA	-834.38	001540.0000.00.002
10123	RISER HD 3/4" 32"V x 36" H	Feb-11-2016	COFA	COPW	-40	EA	-1191.2	001540.0000.00.003
20017	METER BRACKET BR-A ADJUSTABLE	Feb-11-2016	COFA	COPW	-40	EA	-600	001540.0000.00.003
10053	COUPLING-3/4" SF 2406	Aug-25-2016	COPW	COEA	-100	EA	-106.1	001540.0000.00.006
20001	METER AC250 20LT	Aug-26-2016	COTE	COEA	-60	EA	-9422.56	001540.0000.00.006
20001	METER AC250 20LT	Feb-19-2016	COTE	COEA	-60	EA	-9483.33	001540.0000.00.006
20001	METER AC250 20LT	Jan-28-2016	COTE	COPW	-120	EA	-18976.6	001540.0000.00.003
50002	PIPE 1" SDR11HDC	Jul-29-2016	MECY	MEKV	-3000	FT	-1408.36	001540.0000.00.040
50002	PIPE 1" SDR11HDC	Jun-22-2016	MECY	MEKV	-1500	FT	-1425	001540.0000.00.040
10129	TAP TEE EF HVT 2x2 BF 4710 IP	May-27-2016	MECY	COFA	-10	EA	-707.6	001540.0000.00.004
10131	TAP TEE EF HVT 4x2 BF 4710 IP	May-27-2016	MECY	COFA	-10	EA	-741.67	001540.0000.00.004
10132	TAP TEE EF HVT 6x2 BF 4710 IP	May-27-2016	MECY	COFA	-10	EA	-848	001540.0000.00.004
10133	TAP TEE EF HVT 8x2 BF 4710 IP	May-27-2016	MECY	COFA	-25	EA	-2411.25	001540.0000.00.004
20033	METER MANIFOLD 20LT 3 BAR	May-27-2016	MECY	MEKV	-20	EA	-5629.87	001540.0000.00.040
20061	METER SET 2M/3M	May-27-2016	MECY	MEKV	-1	EA	-1726.2	001540.0000.00.040
20028	METER LOCKS #6 HIGHFIELD	Aug-15-2016	MEKV	MECY	-500	EA	-3439.59	001540.0000.00.041
10112	EFV HD 2" SERIES 4710	Jun-03-2016	MEKV	MECY	-50	EA	-2122.5	001540.0000.00.041
10004	BALL VALVE POLY 2" HDPE	Jun-07-2016	MEKV	MECY	-1	EA	-29.5	001540.0000.00.041
10131	TAP TEE EF HVT 4x2 BF 4710 IP	Jun-07-2016	MEKV	MECY	-1	EA	-74.17	001540.0000.00.041
50014	PIPE 4" SDR11HDS	Jun-07-2016	MEKV	MECY	-2280	FT	-8322	001540.0000.00.041
10122	LYCOFIT TEE 1/2" CTS	Jun-23-2016	MEKV	MECY	-20	EA	-300	001540.0000.00.041
10110	EFV HD 1" SERIES 1100 4710	May-27-2016	MEKV	MECY	-50	EA	-1415	001540.0000.00.041
50014	PIPE 4" SDR11HDS	May-27-2016	MEKV	MECY	-1080	FT	-3942	001540.0000.00.041
50016	PIPE 8" SDR11HDS	May-27-2016	MEKV	MECY	-720	FT	-8496	001540.0000.00.041
20003	METER AC630 30LT	Feb-03-2016	MOLE	MOMG	-1	EA	-545.12	001540.0000.00.024
20051	METER ERT ITRON 100G 11T	Aug-19-2016	MOLO	COEA	-100	EA	-5686.82	001540.0000.00.006
20051	METER ERT ITRON 100G 11T	Aug-26-2016	MOLO	MOGA	-60	EA	-3412.09	001540.0000.00.020
10160	TAP TEE SF 2X3/4 HDPE 4710	Jun-21-2016	MOLO	MOLE	-30	EA	-167.98	001540.0000.00.024
20009	METER SENSUS R275	Mar-24-2016	MOLO	MOLE	-60	EA	-9263.99	001540.0000.00.024

LOCATION TABLE

STATE	LOCATION ABBREVIATION	DISTRICT
COLORADO	COGI	EASTERN(ECU)
COLORADO	COPW	PINE
COLORADO	COFA	PUEBLO WEST
COLORADO	COEA	FAIRPLAY
COLORADO	MOGA	EASTERN(ECU)
MISSOURI	MOWA	GALLATIN
MISSOURI	MOLO	WARSAW
MISSOURI	MOBR	LAKE OF THE OZARKS
MISSOURI	MOLE	BRANSON
MISSOURI	MOMG	LEBANON
MISSOURI	MECY	MOUNTAIN GROVE
MISSOURI	MEKV	CUMBERLAND FALMOUTH YARMOUTH
MISSOURI		KENNEBEC VALLEY

Missouri Public Service Commission**Respond Data Request**

Data Request No.	0015
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	8/23/2016
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Michelle A Moorman
Requested By	Steve Dottheim
Brief Description	Charges with Affiliates
Description	Please provide any SNGMO charges to or from any affiliate, including all labor costs and goods/services from January 2013 through June 2016. Data Request submitted by Amanda McMellen (amanda.mcmellen@psc.mo.gov).
Response	Please see the attached spreadsheets (DR0015 final, Affiliate Transaction Report Material Transfers-10-2-13, Affiliate Transaction Report Material Transfers-12-31-14, Affiliate Transaction Report Material Transfers-12-31-15).
Objections	NA

The attached information provided to **Missouri Public Service Commission** Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the **Missouri Public Service Commission** if, during the pendency of Case No. **GO-2012-0322** before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the **Summit Natural Gas of Missouri, Inc.-Investor(Gas)** office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to **Summit Natural Gas of Missouri, Inc.-Investor(Gas)** and its employees, contractors, agents or others employed by or acting in its behalf.

Security :	Public
Rationale :	NA

Data Request No.	0015
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	8/23/2016
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Michelle A Moorman
Requested By	Steve Dottheim
Brief Description	Charges with Affiliates
Description	Please provide any SNGMO charges to or from any affiliate, including all labor costs and goods/services from January 2013 through June 2016. Data Request submitted by Amanda McMellen (amanda.mcmellen@psc.mo.gov).
Due Date	9/12/2016

Answer: Please see the attached spreadsheets (*DR0015 final, Affiliate Transaction Report Material Transfers-10-2-13, Affiliate Transaction Report Material Transfers-12-31-14, Affiliate Transaction Report Material Transfers-12-31-15*).

Answered by Troy Palmer.

GO-2012-0322 DR#0015

Labor Costs TO SNGMO

(labor performed by non-SNGMO employees on behalf of SNGMO)

2016	\$	34,137
2015		
2014		
	\$	<u>34,137</u>

Labor Costs FROM SNGMO

(labor performed by SNGMO employees on behalf of affiliated company)

2016	\$	50,889
2015	\$	131,270
2014	\$	36,262
	\$	<u>218,422</u>

*Materials shown separately

Date of Transfer:	
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[illegible]

Date of Transfer:	
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007

Date of Transfer:	7/15/2014
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Attachment RES-R-4
27/81

Date of Transfer:	8/15/2014
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[illegible]

Date of Transfer:	7/2/2013
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[illegible]

Date of Transfer:	6/28/2013
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Attachment RES-R-4
30/81

Date of Transfer: -	9/1/2013
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Attachment RES-R-4
31/81

Data Request No. 0016
Company Name Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No. GO-2012-0322
Date Requested 8/23/2016
Issue General Information & Miscellaneous - Affiliated Transactions
Requested From Michelle A Moorman
Requested By Steve Dottheim
Brief Description Corporate Governance

Description Please provide the percentages Summit Utilities Inc. withheld from the corporate allocation process for Corporate Governance from January 2014 through June 2016.

Data Request submitted by Amanda McMellen
(amanda.mcmellen@psc.mo.gov).

Due Date 9/12/2016

Answer: Please see the attached spreadsheet (*DR0016 and DR0017 final*).

Answered by Laurie Rydwell

Missouri Public Service Commission**Respond Data Request**

Data Request No.	0016
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	8/23/2016
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Michelle A Moorman
Requested By	Steve Dottheim
Brief Description	Corporate Governance
Description	Please provide the percentages Summit Utilities Inc. withheld from the corporate allocation process for Corporate Governance from January 2014 through June 2016. Data Request submitted by Amanda McMellen (amanda.mcmellen@psc.mo.gov).
Response	Please see the attached spreadsheet (DR0016 and DR0017 final).
Objections	NA

The attached information provided to **Missouri Public Service Commission** Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the **Missouri Public Service Commission** if, during the pendency of Case No. **GO-2012-0322** before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the **Summit Natural Gas of Missouri, Inc.-Investor(Gas)** office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to **Summit Natural Gas of Missouri, Inc.-Investor(Gas)** and its employees, contractors, agents or others employed by or acting in its behalf.

Security :	Public
Rationale :	NA

	%
Jan-14	1%
Feb-14	1%
Mar-14	3%
Apr-14	1%
May-14	1%
Jun-14	1%
Jul-14	3%
Aug-14	5%
Sep-14	4%
Oct-14	5%
Nov-14	5%
Dec-14	6%
Jan-15	6%
Feb-15	27%
Mar-15	13%
Apr-15	9%
May-15	8%
Jun-15	2%
Jul-15	8%
Aug-15	9%
Sep-15	76%
Oct-15	14%
Nov-15	63%
Dec-15	64%
Jan-16	19%
Feb-16	24%
Mar-16	8%
Apr-16	3%
May-16	3%
Jun-16	2%
Weighted average for time period	21%

Missouri Public Service Commission**Respond Data Request**

Data Request No.	0017
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	8/23/2016
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Michelle A Moorman
Requested By	Steve Dottheim
Brief Description	Corporate Costs Allocated To Subsidiaries
Description	Please provide total corporate costs Summit Utilities Inc. allocated to any subsidiaries from January 2013 through June 2016 broken down by direct charges, direct assignment and general allocator. Data Request submitted by Amanda McMellen (amanda.mcmellen@psc.mo.gov).
Response	Please see the attached spreadsheet (DR0016 and DR0017 final).
Objections	NA

The attached information provided to **Missouri Public Service Commission** Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the **Missouri Public Service Commission** if, during the pendency of Case No. **GO-2012-0322** before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the **Summit Natural Gas of Missouri, Inc.-Investor(Gas)** office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to **Summit Natural Gas of Missouri, Inc.-Investor(Gas)** and its employees, contractors, agents or others employed by or acting in its behalf.

Security :	Public
Rationale :	NA

Missouri Public Service Commission

Respond Data Request

Data Request No.	0019
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	6/29/2018
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah A Ahrendt
Requested By	Steve Dottheim
Brief Description	Distrigas Approval
Description	SUI has indicated that that it uses the Distrigas allocation methodology in all jurisdictions in which it operates. Has SUI received formal approval from regulatory authorities to use the Distrigas allocation approach in any of these other jurisdictions in which it operates? If so, please identify the jurisdiction, the form of the formal approval, and the date of the formal approval and provide a copy of the relevant order or other official approval document. DR requested by Amanda McMellen@psc.mo.gov).
Response	Please see attached response to DR0019
Objections	NA

The attached information provided to **Missouri Public Service Commission** Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the **Missouri Public Service Commission** if, during the pendency of Case No. **GO-2012-0322** before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the **Summit Natural Gas of Missouri, Inc.-Investor(Gas)** office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to **Summit Natural Gas of Missouri, Inc.-Investor(Gas)** and its employees, contractors, agents or others employed by or acting in its behalf.

Security :	Public
Rationale :	NA

Missouri Public Service Commission

Data Request

Data Request No.	0019
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	6/29/2018
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah A Ahrendt
Requested By	Steve Dottheim
Brief Description	Distrigas Approval
Description	SUI has indicated that that it uses the Distrigas allocation methodology in all jurisdictions in which it operates. Has SUI received formal approval from regulatory authorities to use the Distrigas allocation approach in any of these other jurisdictions in which it operates? If so, please identify the jurisdiction, the form of the formal approval, and the date of the formal approval and provide a copy of the relevant order or other official approval document. DR requested by Amanda McMellen@psc.mo.gov).
Due Date	7/19/2018
Response	There has been no formal approval from regulatory authorities to use Distrigas allocation, however, SUI is using the same consistent Distrigas formula in all subsidiaries.
Response Provided By	Amanda Tolbert
Security	Public
Rationale	NA

Missouri Public Service Commission

Respond Data Request

Data Request No.	0020
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	6/29/2018
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah A Ahrendt
Requested By	Steve Dottheim
Brief Description	Allocation Methodology
Description	Is it possible for SUI to use a different overhead allocation methodology in Missouri than used in other jurisdictions (i.e., general allocator vs. Distrigas)? DR requested by Amanda McMellen@psc.mo.gov).
Response	Please see attached response to DR0020
Objections	NA

The attached information provided to **Missouri Public Service Commission** Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the **Missouri Public Service Commission** if, during the pendency of Case No. **GO-2012-0322** before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the **Summit Natural Gas of Missouri, Inc.-Investor(Gas)** office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to **Summit Natural Gas of Missouri, Inc.-Investor(Gas)** and its employees, contractors, agents or others employed by or acting in its behalf.

Security :	Public
Rationale :	NA

Missouri Public Service Commission

Data Request

Data Request No.	0020
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	6/29/2018
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah A Ahrendt
Requested By	Steve Dottheim
Brief Description	Allocation Methodology
Description	Is it possible for SUI to use a different overhead allocation methodology in Missouri than used in other jurisdictions (i.e., general allocator vs. Distrigas)? DR requested by Amanda McMellen@psc.mo.gov).
Due Date	7/19/2018
Response	Yes, it is possible for SUI to use a different overhead allocation methodology, but it would be burdensome and costly to utilize a different allocation method between utilities. All the utilities use the same ERP system that has been programmed to allocate overhead costs consistently. If the allocation method changes, the allocation will be manual and outside the ERP system with more room for error and possible additional staff to administer. Other issues would be variance analysis, financial reporting and regulatory reporting would be inconsistent between states and more time consuming to produce.
Response Provided By	Amanda Tolbert
Security	Public
Rationale	NA

Missouri Public Service Commission

Respond Data Request

Data Request No.	0022
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	6/29/2018
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah A Ahrendt
Requested By	Steve Dottheim
Brief Description	Benchmarking
Description	Does SNGMO use benchmarking in the purchase of goods and services from any affiliated company? If the answer is "yes," please explain the benchmarking that is used by SNGMO. If the answer is "no," why hasn't SNGMO used benchmarking to attempt to comply with the market value requirements of the Affiliate Transactions Rule? DR requested by Amanda McMellen@psc.mo.gov).
Response	Please see attached response to DR0022
Objections	NA

The attached information provided to **Missouri Public Service Commission** Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the **Missouri Public Service Commission** if, during the pendency of Case No. **GO-2012-0322** before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the **Summit Natural Gas of Missouri, Inc.-Investor(Gas)** office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to **Summit Natural Gas of Missouri, Inc.-Investor(Gas)** and its employees, contractors, agents or others employed by or acting in its behalf.

Security :	Public
Rationale :	NA

Missouri Public Service Commission

Data Request

Data Request No.	0022
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	6/29/2018
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah A Ahrendt
Requested By	Steve Dottheim
Brief Description	Benchmarking
Description	Does SNGMO use benchmarking in the purchase of goods and services from any affiliated company? If the answer is "yes," please explain the benchmarking that is used by SNGMO. If the answer is "no," why hasn't SNGMO used benchmarking to attempt to comply with the market value requirements of the Affiliate Transactions Rule? DR requested by Amanda McMellen@psc.mo.gov).
Due Date	7/19/2018
Company Response	SNGMO follows the procurement procedures outlined in the Procurement Policy attached to Data Request 21 for goods. This includes seeking competitive bids for most purchases and selecting vendors based on price, quality, service, availability, and lead time. SNGMO does not formally benchmark services provided by the shared services company due to the limited size of the shared services staff and types of services that are provided.
Response Provided By:	Travis Walton
Security	Public

Missouri Public Service Commission**Respond Data Request**

Data Request No.	0023
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	6/29/2018
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah A Ahrendt
Requested By	Steve Dottheim
Brief Description	Variance
Description	Is Staff's understanding correct that SNGMO does not maintain SNGMO's books, accounts, and records for SNGMO, rather SUI does? If the Staff's understanding is correct, will SNGMO seek a variance pursuant to 4 CSR 240-40.015(10)(A)1 and 4 CSR 240-240-2.060(4) for good cause shown regarding this matter? DR requested by Amanda McMellen@psc.mo.gov).
Response	Please see attached response to DR0023
Objections	NA

The attached information provided to **Missouri Public Service Commission** Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the **Missouri Public Service Commission** if, during the pendency of Case No. **GO-2012-0322** before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the **Summit Natural Gas of Missouri, Inc.-Investor(Gas)** office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to **Summit Natural Gas of Missouri, Inc.-Investor(Gas)** and its employees, contractors, agents or others employed by or acting in its behalf.

Security :	Public
Rationale :	NA

Missouri Public Service Commission

Data Request

Data Request No.	0023
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	6/29/2018
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah A Ahrendt
Requested By	Steve Dottheim
Brief Description	Variance
Description	Is Staff's understanding correct that SNGMO does not maintain SNGMO's books, accounts, and records for SNGMO, rather SUI does? If the Staff's understanding is correct, will SNGMO seek a variance pursuant to 4 CSR 240-40.015(10)(A)1 and 4 CSR 240-240-2.060(4) for good cause shown regarding this matter? DR requested by Amanda McMellen@psc.mo.gov).
Due Date	7/19/2018
Response	While SNGMMO employees do not maintain SNGMO books, SUI does maintain SNGMO's books, accounts, and records separate from those of its affiliates. As such, SNGMO does not believe that a variance is necessary.
Security	Public

Response provided by: Amanda Tolbert

Missouri Public Service Commission**Respond Data Request**

Data Request No.	0024
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	6/29/2018
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah A Ahrendt
Requested By	Steve Dottheim
Brief Description	Variances
Description	Are there affiliate transactions that SNGMO has engaged in or is engaging in for which SNGMO believes it needs or very likely needs a variance from the Commission for, but has not sought a variance from the Commission? Please identify these affiliate transactions. DR requested by Amanda McMellen@psc.mo.gov).
Response	Please see attached response to DR0024
Objections	NA

The attached information provided to **Missouri Public Service Commission** Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the **Missouri Public Service Commission** if, during the pendency of Case No. **GO-2012-0322** before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the **Summit Natural Gas of Missouri, Inc.-Investor(Gas)** office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to **Summit Natural Gas of Missouri, Inc.-Investor(Gas)** and its employees, contractors, agents or others employed by or acting in its behalf.

Security :	Public
Rationale :	NA

Missouri Public Service Commission

Data Request

Data Request No.	0024
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	6/29/2018
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah A Ahrendt
Requested By	Steve Dottheim
Brief Description	Variances
Description	Are there affiliate transactions that SNGMO has engaged in or is engaging in for which SNGMO believes it needs or very likely needs a variance from the Commission for, but has not sought a variance from the Commission? Please identify these affiliate transactions. DR requested by Amanda McMellen@psc.mo.gov).
Due Date	7/19/2018
Response	<p>SNGMO believes that the following transactions will need a variance but has not formally requested:</p> <ul style="list-style-type: none">• Distrigas methodology• Competitive bid process or FMP for all SNGMO affiliate purchases• Affiliate transactions for information, assets, goods or services by SNGMO be compensated at the greater of fair market price or the fully distributed cost• Affiliate transactions for information, assets, goods or services by a non-regulated affiliate to SNGMO be compensated at the lower of fair market price or affiliate's fully distributed cost
Response Provided By	Amanda Tolbert
Security	Public
Rationale	NA

Missouri Public Service Commission**Respond Data Request**

Data Request No.	0025
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	7/3/2018
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah A Ahrendt
Requested By	Steve Dottheim
Brief Description	External Audit Studies
Description	Have any external, non-public service commission audit studies of SNGMO or SUI been completed in the last three years (by July 1, 2016 to June 30, 2018)? If "yes," Staff requests a copy of each. Data Request submitted by Amanda McMellen (amanda.mcmellen@psc.mo.gov).
Response	Please see attached response to DR0025
Objections	NA

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Security :	Public
Rationale :	NA

Missouri Public Service Commission

Data Request

Data Request No.	0025
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	7/3/2018
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah A Ahrendt
Requested By	Steve Dottheim
Brief Description	External Audit Studies
Description	Have any external, non-public service commission audit studies of SNGMO or SUI been completed in the last three years (by July 1, 2016 to June 30, 2018)? If "yes," Staff requests a copy of each. Data Request submitted by Amanda McMellen (amanda.mcmellen@psc.mo.gov).
Due Date	7/23/2018
Response	No audit studies other than the annual financial audits and subsequent reports have been completed.
Response provided by:	Justina Waller
Security	Public

Missouri Public Service Commission

Respond Data Request

Data Request No.	0026
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	7/3/2018
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah A Ahrendt
Requested By	Steve Dottheim
Brief Description	SUI or Some Other SUI Entity Catalog
Description	Is there a products, services, and/or information catalog of SUI or some other SUI entity that is available to SNGMO to use to select products, services, and/or information to meet its needs? If the answer is "yes," please provide a copy. Data Request submitted by Amanda McMellen (amanda.mcmellen@psc.mo.gov).
Response	Please see attached response to DR0026
Objections	NA

The attached information provided to **Missouri Public Service Commission** Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the **Missouri Public Service Commission** if, during the pendency of Case No. **GO-2012-0322** before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the **Summit Natural Gas of Missouri, Inc.-Investor(Gas)** office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to **Summit Natural Gas of Missouri, Inc.-Investor(Gas)** and its employees, contractors, agents or others employed by or acting in its behalf.

Security :	Public
Rationale :	NA

Missouri Public Service Commission

Data Request

Data Request No.	0026
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	7/3/2018
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah A Ahrendt
Requested By	Steve Dottheim
Brief Description	SUI or Some Other SUI Entity Catalog
Description	Is there a products, services, and/or information catalog of SUI or some other SUI entity that is available to SNGMO to use to select products, services, and/or information to meet its needs? If the answer is "yes," please provide a copy. Data Request submitted by Amanda McMellen (amanda.mcmellen@psc.mo.gov).
Due Date	7/23/2018
Response	No, there is not a products, services and/or information catalog of SUI that is available to SNGMO.
Response Provided By	Amanda Tolbert
Security	Public

Missouri Public Service Commission**Respond Data Request**

Data Request No.	0027
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	7/3/2018
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah A Ahrendt
Requested By	Steve Dottheim
Brief Description	Organizational Charts
Description	If there is any organizational chart(s) of SUI that displays how it functions as a service company, please provide it. Data Request submitted by Amanda McMellen (amanda.mcmellen@psc.mo.gov).
Response	Please see attached response to DR0027
Objections	NA

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Security :	Public
Rationale :	NA

Missouri Public Service Commission

Data Request

Data Request No.	0028
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	7/3/2018
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah A Ahrendt
Requested By	Steve Dottheim
Brief Description	List of Services, Goods, and/or Information Provided By SUI
Description	Is there a more complete list of goods, services, and/or information provided to affiliates, including to SNGMO, than the one attached to SNGMO's draft CAM as Tab O, Appendix 2? If the answer is "yes," please provide a copy. Data Request submitted by Amanda McMellen (Amanda.mcmellen@psc.mo.gov).
Due Date	7/23/2018
Response	The list provided is a complete list of goods, services, and/or information provided to affiliates.
Response Provided By	Amanda Tolbert
Security	Public

Missouri Public Service Commission

Respond Data Request

Data Request No.	0029
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	7/3/2018
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah A Ahrendt
Requested By	Steve Dottheim
Brief Description	Charges on Invoices
Description	What does SUI mean by "Invoices are directly coded to the entity that received the good or service" and ""No distribution is necessary"? Does an invoice to SNGMO for goods, services, and/or information from SUI reflect the characterization on Tab O, Appendix 2 of the categories for the goods, services, and/or information provided or the 2017 Affiliate Transactions Report March 15 filing characterization of services provided by SUI to SNGMO? Are the charges on the invoices/direct coding determined on an FDC basis? Are there other goods, services, and/or information being charged to SNGMO by SUI on invoices/direct coded characterized in some other manner, not reflected in Tab O, Appendix 2 or the 2017 Affiliate Transactions Report? Data Request submitted by Amanda McMellen (amanda.mcmellen@psc.mo.gov).
Response	Please see attached response to DR0029
Objections	NA

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Security :	Public
Rationale :	NA

Missouri Public Service Commission

Data Request

Data Request No.	0029
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	7/3/2018
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah A Ahrendt
Requested By	Steve Dottheim
Brief Description	Charges on Invoices
Description	<p>What does SUI mean by "Invoices are directly coded to the entity that received the good or service" and "No distribution is necessary"? Does an invoice to SNGMO for goods, services, and/or information from SUI reflect the characterization on Tab O, Appendix 2 of the categories for the goods, services, and/or information provided or the 2017 Affiliate Transactions Report March 15 filing characterization of services provided by SUI to SNGMO? Are the charges on the invoices/direct coding determined on an FDC basis? Are there other goods, services, and/or information being charged to SNGMO by SUI on invoices/direct coded characterized in some other manner, not reflected in Tab O, Appendix 2 or the 2017 Affiliate Transactions Report? Data Request submitted by Amanda McMellen (amanda.mcmellen@psc.mo.gov).</p>
Due Date	7/23/2018
Response	<p>The Accounts Payable department for SUI is responsible for paying all invoices for SUI and affiliated companies. Some vendors invoice multiple entities on the same invoice, but those charges are directly charged to the appropriate entity. An example would be the medical benefits administration billing each month which is invoiced for all entities on one billing/invoice but segregated and then directly charged to each entity.</p> <p>There is no invoice for shared services provided by SUI. The shared services costs are coded to a shared services workorder (not designated by services listed in Tab O, Appendix 2) and then allocated each month via Distrigas.</p>
Response Provided By	Amanda Tolbert
Security	Public

Missouri Public Service Commission**Respond Data Request**

Data Request No.	0030
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	7/3/2018
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah A Ahrendt
Requested By	Steve Dottheim
Brief Description	Tab O, Appendix 2
Description	SNGMO's 2017 Affiliate Transactions Report February 28, 2018 filing in EFIS showing SUI services, goods, and/or information provided by to SNGMO are not denominated into categories similarly titled as the categories denominated on Tab O, Appendix 2 of SNGMO's draft CAM provided to Staff and Public Counsel. Staff requests that SNGMO and/or SUI reconcile the titles of the categories of services, goods, and/or information on the two lists. Data Request submitted by Amanda McMellen (amanda.mcmellen@psc.mo.gov).
Response	Please see attached response to DR0030
Objections	NA

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Security :	Public
Rationale :	NA

Missouri Public Service Commission

Data Request

Data Request No.	0030
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	7/3/2018
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah A Ahrendt
Requested By	Steve Dottheim
Brief Description	Tab O, Appendix 2
Description	SNGMO's 2017 Affiliate Transactions Report February 28, 2018 filing in EFIS showing SUI services, goods, and/or information provided by to SNGMO are not denominated into categories similarly titled as the categories denominated on Tab O, Appendix 2 of SNGMO's draft CAM provided to Staff and Public Counsel. Staff requests that SNGMO and/or SUI reconcile the titles of the categories of services, goods, and/or information on the two lists. Data Request submitted by Amanda McMellen (amanda.mcmellen@psc.mo.gov).
Due Date	7/23/2018
Response	Shared services are not coded and invoiced based on the categories in Tab O. The shared services costs are charged to a shared services workorder and then allocated via Distrigas.
Response Provided By	Amanda Tolbert

Missouri Public Service Commission

Respond Data Request

Data Request No.	0034
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	7/3/2018
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah A Ahrendt
Requested By	Steve Dottheim
Brief Description	Affiliate Report Format
Description	Where is SNGMO in the process of developing a complete affiliate report format and making it an appendix to the CAM? Data Request submitted by Amanda McMellen (Amanda.mcmellen@psc.mo.gov).
Response	Please see attached response to DR0034
Objections	NA

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Security :	Public
Rationale :	NA

Missouri Public Service Commission

Data Request

Data Request No.	0034
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	7/3/2018
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah A Ahrendt
Requested By	Steve Dottheim
Brief Description	Affiliate Report Format
Description	Where is SNGMO in the process of developing a complete affiliate report format and making it an appendix to the CAM? Data Request submitted by Amanda McMellen (Amanda.mcmellen@psc.mo.gov).
Due Date	7/23/2018
Response	SNGMO has not developed an affiliate report format but would like to work with staff to develop a format that is agreeable between both parties and meets all of the necessary requirements.
Response Provided By	Amanda Tolbert
Security	Public
Rationale	NA

Missouri Public Service Commission**Respond Data Request**

Data Request No.	0035
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	9/19/2018
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah A Ahrendt
Requested By	Steve Dottheim
Brief Description	A.O.G. Corporation
Description	Please provide a detailed description listing the costs charged by SUI to A.O.G. Corporation. Please describe the current activities of A.O.G. Corporation. Data Request submitted by Amanda McMellen (amanda.mcmellen@psc.mo.gov).
Response	Please see attached
Objections	NA

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Security :	Public
Rationale :	NA

Data Request No. 35- GO-2012-0322

Please provide a detailed description listing the costs charged by SUI to A.O.G. Corporation.
Please describe the current activities of A.O.G.

Response: There are currently no costs being charged by SUI to A.O.G. Corporation. A. O. G. Corporation was formed for the sole purpose of acting as a holding company. The only wholly owned subsidiary of A.O.G. Corporation is Arkansas Oklahoma Gas Corporation. A.O.G. Corporation has debt and incurs interest expense, audit/tax fees, and pension costs associated with Arkansas Oklahoma Gas Corporation.

Response provided by: Amanda Tolbert

Missouri Public Service Commission

Respond Data Request

Data Request No.	0036
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	9/28/2018
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah A Ahrendt
Requested By	Steve Dottheim
Brief Description	Management/Consulting Firms
Description	Has SUI or SNGMO ever considered seeking or sought information from management / consulting firms whether any utilities or management / consulting firms have ever performed a survey of utilities that use competitive bids and/or benchmarking in the process of evaluating the purchase of goods or services from non-affiliates? Would SNG or SNGMO consider doing so? Data Request submitted by Amanda McMellen (amanda.mcmellen@psc.mo.gov).
Response	Please see attachment
Objections	NA

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Security :	Public
Rationale :	NA

Data Request No. 36- GO-2012-0322

Has SUI or SNGMO ever considered seeking or sought information from management / consulting firms whether any utilities or management / consulting firms have ever performed a survey of utilities that use competitive bids and/or benchmarking in the process of evaluating the purchase of goods or services from non-affiliates? Would SNG or SNGMO consider doing so?

Response: SUI or SNGMO has not sought or received information from any outside firms or companies whether any utilities have ever performed a survey of utilities that use competitive bids and/or benchmarking. If there are such surveys available for review, SNGMO would consider reviewing that information.

Response provided by: Amanda Tolbert

Missouri Public Service Commission**Respond Data Request**

Data Request No.	0037
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	9/28/2018
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah A Ahrendt
Requested By	Steve Dottheim
Brief Description	Workorders
Description	Shared services are charged to a shared services work order. Please provide 25 samples of what SUI or SNGMO consider typical workorders. Data Request submitted by Amanda McMellen (amanda.mcmellen@psc.mo.gov).
Response	Please see attached.
Objections	NA

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Security :	Public
Rationale :	NA

Data Request No. 37- GO-2012-0322

Shared services are charged to a shared services work order. Please provide 25 samples of what SUI or SNGMO consider typical workorders.

Response:

Work order Number	Workorder Name	Description
PP-06-23	MOS - Legal & Regulatory	Includes legal fees, regulatory legal, regulatory/PUC fees, and internal legal labor
PP-06-26	MOS - Customer Care & Collection (903)	Includes Merchant Fees, Customer Care & Collections labor, Outside collection fees, Bad Debt
MOS594	MOS - Facilities Maint (932)	Maintaining State Facilities. Includes snow removal and lawn mowing
MOS597	MOS - Distr Ops Supervision (870)	Supervision of Operation of Distribution Mains
MOS598	MOS - Trans Ops Supervision (850)	Supervision of Operation of Transmission Mains
MOS267	GA - Customer Install Exp (879)	Customer installation expense blanket by rate area
MOS268	GA - Dist compressor station (872)	Dist compressor station expense blanket by rate area
MOS271	GA - Dist M&R Sta Exp - Ind (876)	Dist M&R station expense blanket (industrial) by rate area
MOS272	GA - Dist mains Leak Survey (874)	Distribution mains leak survey expense blanket by rate area
MOS273	GA - Dist other exp (880)	Dist other expense blanket by rate area
MOS274	GA - Dist rents (ROW) (881)	Dist rents (ROWs, etc.) expense blanket by rate area
MOS275	GA - Leak Emergency Invest (874)	Leak emergency expense blanket by rate area
MOS276	GA - Locates (874)	Locates expense blanket by rate area
MOS277	GA - Meter Reading (902)	Meter reading expense blanket by rate area
MOS278	GA - Meter & house reg exp (878)	Meter and house reg expense blanket by rate area
MOS279	GA - OQ Training (920)	OQ training expense blanket by rate area

Work order Number	Workorder Name	Description
MOS280	GA - Safety/OSHA Mtgs & Training (920)	Safety meetings and training expense blanket by rate area
MOS281	GA - Sales Activities (912)	District Level Sales Labor, or District specific external sales costs
MOS282	GA - Service line Leak Srvy (874)	Service line leak survey expense blanket by rate area
PP-02-1004	Cayenta Capitalized Improvements (Cap)	ERP Implementation
PP-06-24	MOS - Corporate Governance (920)	Includes Audit/Tax & Other Governance
MOS1673	Sys Improve - Trans - Construction	Replacing existing undersized compressor at Diggins Site
MOS2195	Sys Exp - Dist - Construction	Install 2.366' 2" PE - Copper Rock Assisted Living and Firehouse
MOS6115	Sys Improve - Dist Reg St. - Construction	Brooklyn Station Metering Addition
PP-06-21	MOS - General Admin (920)	Includes SUI charging CNG Administrative Labor (non local labor) and other state specific expenses (travel, insurance, phones, postage/billing, recruiting, Copier/IT, etc.)

Response provided by: Amanda Tolbert

Missouri Public Service Commission

Respond Data Request

Data Request No.	0038
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	9/28/2018
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah A Ahrendt
Requested By	Steve Dottheim
Brief Description	Products/Services From SUI
Description	(1) How is it determined what goods and services in what amount, and at what level of enhancement, SNGMO requires from SUI, if SUI, the service company, is used as the vendor? Are all the preceding details determined pursuant to the SUI Procurement Policy without there being a need for a meeting between SNGMO and SUI, the service company, personnel or there being a products, services, and/or information catalog of SUI for SNGMO to work from? (2) How frequently, e.g., on a yearly basis, every 2 years, etc., is this process in (1) engaged in by SNGMO and SUI, if SUI is involved at all? Data Request submitted by Amanda McMellen (amanda.mcmellen@psc.mo.gov).
Response	Please see attached.
Objections	NA

The attached information provided to **Missouri Public Service Commission** Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the **Missouri Public Service Commission** if, during the pendency of Case No. **GO-2012-0322** before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the **Summit Natural Gas of Missouri, Inc.-Investor(Gas)** office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to **Summit Natural Gas of Missouri, Inc.-Investor(Gas)** and its employees, contractors, agents or others employed by or acting in its behalf.

Security :	Public
Rationale :	NA

Data Request No. 38- GO-2012-0322

(1) How is it determined what goods and services in what amount, and at what level of enhancement, SNGMO requires from SUI, if SUI, the service company, is used as the vendor? Are all the preceding details determined pursuant to the SUI Procurement Policy without there being a need for a meeting between SNGMO and SUI, the service company, personnel or there being a products, services, and/or information catalog of SUI for SNGMO to work from?

(2) How frequently, e.g., on a yearly basis, every 2 years, etc., is this process in (1) engaged in by SNGMO and SUI, if SUI is involved at all?

Response:

- (1) Goods and services to be provided by SUI to SNGMO have been determined over the years by the review of what services are needed by SNGMO and what can be provided by SUI. There is no formal meeting or catalog from SUI to choose products or services from.
- (2) There is no set process or timeline to review the services by provided by SUI.

Response provided by: Amanda Tolbert

Missouri Public Service Commission**Respond Data Request**

Data Request No.	0039
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	9/28/2018
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah A Ahrendt
Requested By	Steve Dottheim
Brief Description	SUI or Third Party Vendor
Description	(1) What are the details of the process by which the determination is made if SUI, the service company, is used, as the vendor for a product, service or information, or if proposals will be sought from third party vendors, in addition to SUI or just from third party vendors? (2) Staff has a copy of the SUI Procurement Policy. The processes that Staff is enquiring about in (1) is not set out in that document, i.e., a process(es) for joint planning by SUI and SNGMO and the process for SNGMO seeking competitive bids, although competitive bidding is addressed in a limited way in Appendix E on page 11 of SUI's Procurement Policy. Have the processes Staff is enquiring about been set out in a SUI and/or a SNGMO policy or procedure document, such as documents entitled, for example, "SNGMO Joint Planning Procurement Procedure for Purchasing SUI, Inc. Products and Services" and "SNGMO Competitive Bidding Procurement Procedure." If "yes," please provide copies. Or is there no joint process between SUI and SNGMO, the service company? Data Request submitted by Amanda McMellen (amanda.mcmellen@psc.mo.gov).
Response	Please see attached.
Objections	NA

The attached information provided to **Missouri Public Service Commission** Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the **Missouri Public Service Commission** if, during the pendency of Case No. **GO-2012-0322** before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the **Summit Natural Gas of Missouri, Inc.-Investor(Gas)** office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to **Summit Natural Gas of Missouri, Inc.-Investor(Gas)** and its employees, contractors, agents or others employed by or acting in its behalf.

Security :	Public
Rationale :	NA

Data Request No. 39- GO-2012-0322

(1) What are the details of the process by which the determination is made if SUI, the service company, is used, as the vendor for a product, service or information, or if proposals will be sought from third party vendors, in addition to SUI or just from third party vendors?

(2) Staff has a copy of the SUI Procurement Policy. The processes that Staff is enquiring about in (1) is not set out in that document, i.e., a process(es) for joint planning by SUI and SNGMO and the process for SNGMO seeking competitive bids, although competitive bidding is addressed in a limited way in Appendix E on page 11 of SUI's Procurement Policy. Have the processes Staff is enquiring about been set out in a SUI and/or a SNGMO policy or procedure document, such as documents entitled, for example, "SNGMO Joint Planning Procurement Procedure for Purchasing SUI, Inc. Products and Services" and "SNGMO Competitive Bidding Procurement Procedure." If "yes," please provide copies. Or is there no joint process between SUI and SNGMO, the service company?

Response: There is no joint process policy or procedure document.

Response provided by: Helen Ayotte

Missouri Public Service Commission

Respond Data Request

Data Request No.	0040
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	9/28/2018
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah A Ahrendt
Requested By	Steve Dottheim
Brief Description	Joint Planning
Description	Are documents exchanged between SUI, the service company, and SNGMO, and joint meetings held to determine what goods and services, in what amount, at what level of enhancement, over what period of time, SUI, the services company, will provide? If such a "joint planning" document does not exist, please indicate what is the process by which SNGMO indicates to SUI what goods and services with what specifications it needs or SUI indicates to SGMO what goods and services it has and proposes to offer to SNGMO? Data Request submitted by Amanda McMellen (amanda.mcmellen@psc.mo.gov).
Response	Please see attached.
Objections	NA

The attached information provided to **Missouri Public Service Commission** Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the **Missouri Public Service Commission** if, during the pendency of Case No. **GO-2012-0322** before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the **Summit Natural Gas of Missouri, Inc.-Investor(Gas)** office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to **Summit Natural Gas of Missouri, Inc.-Investor(Gas)** and its employees, contractors, agents or others employed by or acting in its behalf.

Security :	Public
Rationale :	NA

Data Request No. 40- GO-2012-0322

Are documents exchanged between SUI, the service company, and SNGMO, and joint meetings held to determine what goods and services, in what amount, at what level of enhancement, over what period of time, SUI, the services company, will provide? If such a "joint planning" document does not exist, please indicate what is the process by which SNGMO indicates to SUI what goods and services with what specifications it needs or SUI indicates to SGMO what goods and services it has and proposes to offer to SNGMO?

Response: There is no set process or timeline to review the services by provided by SUI.

Response provided by: Amanda Tolbert

Missouri Public Service Commission**Respond Data Request**

Data Request No.	0041
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	9/28/2018
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah A Ahrendt
Requested By	Steve Dottheim
Brief Description	Contracts with Third Party Vendors
Description	Please identify contracts presently in effect that SNGMO has with third party vendors awarded by means of a competitive bid process that amount to in excess of \$100,000? Data Request submitted by Amanda McMellen (amanda.mcmellen@psc.mo.gov).
Response	Please see attached.
Objections	NA

The attached information provided to **Missouri Public Service Commission** Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the **Missouri Public Service Commission** if, during the pendency of Case No. **GO-2012-0322** before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the **Summit Natural Gas of Missouri, Inc.-Investor(Gas)** office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to **Summit Natural Gas of Missouri, Inc.-Investor(Gas)** and its employees, contractors, agents or others employed by or acting in its behalf.

Security :	Public
Rationale :	NA

Data Request No. 41- GO-2012-0322

Please identify contracts presently in effect that SNGMO has with third party vendors awarded by means of a competitive bid process that amount to in excess of \$100,000?

CONFIDENTIAL Response: In addition to gas supply vendors, SNGMO currently has contacts in place with the following vendors, that were selected either due to pricing, capabilities or availability at the time of contract award.

Allied Supply, Inc
ANR Pipeline Company
Apperson Utility Contracting
Archrock Partners
Automotive Rentals, Inc.
BFH, LLC
Bryan Cave LLP
Brydon, Swearengen & England
CenturyLink
Cutting Edge Dirtworks
Ford Credit
Groebner & Associates, Inc.
Insight Direct USA, Inc.
Koons Gas Measurement
Latham & Watkins LLP
Linn Operating, LLC
Mountain States Pipe & Supply
Nail Excavating
Paymentus Group, Inc.
PriceWaterHouseCoopers (PwC)
Prometheus
Rev Spring, Inc.
Southern Cross Corp

Response provided by: Amanda Tolbert

Missouri Public Service Commission

Respond Data Request

Data Request No.	0042
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	9/28/2018
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah A Ahrendt
Requested By	Steve Dottheim
Brief Description	Competitive Bidding
Description	Appendix E on page 11 of SUI's Procurement Policy relates, in part, that when competitive bidding is engaged in, the Procurement Department of the Company, i.e., SNGMO, seeks to obtain at least three quotes for the desired goods and will evaluate pricing, lead time, quality, and environmental, social, and governance performance criteria. Is there any written policy and procedures other than SUI's Procurement Policy on how the Procurement Department is to engage in selecting third party vendors? If "yes," please provide copies of such documents. Data Request submitted by Amanda McMellen (amanda.mcmellen@psc.mo.gov).
Response	Please see attached.
Objections	NA

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Security :	Public
Rationale :	NA

Data Request No. 42- GO-2012-0322

Appendix E on page 11 of SUI's Procurement Policy relates, in part, that when competitive bidding is engaged in, the Procurement Department of the Company, i.e., SNGMO, seeks to obtain at least three quotes for the desired goods and will evaluate pricing, lead time, quality, and environmental, social, and governance performance criteria. Is there any written policy and procedures other than SUI's Procurement Policy on how the Procurement Department is to engage in selecting third party vendors? If "yes," please provide copies of such documents.

Response: No.

Response provided by: Helen Ayotte

Missouri Public Service Commission

Respond Data Request

Data Request No.	0043
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	9/28/2018
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah A Ahrendt
Requested By	Steve Dottheim
Brief Description	Procurement Policies and Procedures
Description	In Staff Data Request No. 0021, the Staff requested a "copy of SNGMO's Procurement Policies and Procedures and SUI's Procurement Policies and Procedures." SNGMO provided a copy of "Summit Utilities Procurement Policy," which addresses competitive bidding in a limited way in Appendix E on page 11 under the headings "How are Vendors selected?" and "How are Vendors evaluated when sourcing Goods?" and to a limited extent on pages 12 and 13. Staff is interested in any additional, more complete treatment of obtaining third party (non-affiliate) vendors. Please provide any SUI and SNGMO policies and procedures that address which goods and services the Company, i.e., SNGMO, should acquire through competitive bidding or third party vendor. Data Request submitted by Amanda McMellen (amanda.mcmellen@psc.mo.gov).
Response	Please see attached.
Objections	NA

The attached information provided to **Missouri Public Service Commission** Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the **Missouri Public Service Commission** if, during the pendency of Case No. **GO-2012-0322** before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the **Summit Natural Gas of Missouri, Inc.-Investor(Gas)** office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to **Summit Natural Gas of Missouri, Inc.-Investor(Gas)** and its employees, contractors, agents or others employed by or acting in its behalf.

Security :	Public
Rationale :	NA

Data Request No. 43- GO-2012-0322

In Staff Data Request No. 0021, the Staff requested a “copy of SNGMO’s Procurement Policies and Procedures and SUI’s Procurement Policies and Procedures.” SNGMO provided a copy of “Summit Utilities Procurement Policy,” which addresses competitive bidding in a limited way in Appendix E on page 11 under the headings “How are Vendors selected?” and “How are Vendors evaluated when sourcing Goods?” and to a limited to extent on pages 12 and 13. Staff is interested in any additional, more complete treatment of obtaining third party (non-affiliate) vendors. Please provide any SUI and SNGMO policies and procedures that address which goods and services the Company, i.e., SNGMO, should acquire through competitive bidding or third party vendor.

Response: There are no additional policies or procedures.

Response provided by: Helen Ayotte

Missouri Public Service Commission**Respond Data Request**

Data Request No.	0044
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	9/28/2018
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah A Ahrendt
Requested By	Steve Dottheim
Brief Description	Listing of Affiliates of SNGMO
Description	Please see attached for data request. Data Request submitted by Amanda McMellen (amanda.mcmellen@psc.mo.gov).
Response	Please see attached.
Objections	NA

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Security :	Public
Rationale :	NA

Data Request No. 44- GO-2012-0322

On June 10, 2016, Staff submitted Data Request No. 0005, which asked in part: "Please provide a current listing of all 'affiliates' (as that term is defined in the Missouri Commission's Affiliate Transactions Rule, 4 CSR 240-20.015) of Summit Natural Gas of Missouri ("SNGMO"), with a short description of each affiliate's primary business purposes. . . ." One of the affiliates that SUI/SNGMO listed in response to Staff Data Request No. 0005 submitted in 2016 was the affiliate Summit Utilities Management Services, LLC. SUI/SNGMO's response explained that this affiliate is:

A non-regulated construction management and operations services company that specializes in natural gas distribution. This company is currently active and does not exchange goods/services with SNGMO.

There are other companies shown on page 1 of SNGMO's Affiliate Transaction Report for 2017 and 2016 as affiliated entities of SNGMO which did not exchange goods/services with SNGMO just as Summit Utilities Management Services, LLC did not do. Natural Gas Conversion Company is shown in response to Staff Data Request No. 5 and also in SNGMO's Affiliate Transaction Report for 2017 and 2016 as an affiliate of SNGMO even though it did not exchange goods/services with SNGMO and apparently became inactive in 2017. Summit Utilities Management Services, LLC is also not shown as an affiliate of SNGMO in SNGMO's Affiliate Transaction Report for 2017 and 2016 although other affiliates which did not exchange goods/services with SNGMO are shown. The Organizational Chart for SUI in the latest version of the draft CAM Tab O, Appendix 1, Footnote 2 states "Dissolution of Natural Gas Conversion Company and Summit Utilities Management Services, LLC may occur in 2017." Please provide an explanation for the apparent different treatment in the provision of information on Summit Utilities Management Services, LLC in the Affiliate Transaction Reports for 2017 and 2016?

Response: Summit Utilities Management Services, LLC did not have any activity in 2017, and was thus not shown on SNGMO's Affiliate Transaction report for 2017. Natural Gas Conversion Company and Summit Utilities Management Services, LLC were both dissolved in 2017.

Response provided by: Steve Birchfield

Missouri Public Service Commission**Respond Data Request**

Data Request No.	0046
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	9/28/2018
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Hannah A Ahrendt
Requested By	Steve Dottheim
Brief Description	SUI Services
Description	Please see attached for data request. Data Request submitted by Amanda McMellen (amanda.mcmellen@psc.mo.gov).
Response	Please see attached.
Objections	NA

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Security :	Public
Rationale :	NA

Data Request No. 46- GO-2012-0322

On SNGMO's 2017 Affiliate Transaction Report to the Commission SNGMO showed the services/goods listed below as being provided by SUI to SNGMO. Are any of these services or goods which are being provided by SUI, the services company, being provided to another SUI affiliate by a third party instead of by SUI, the services company? If "yes," please identify the affiliate, the service/good, and the third party providing the service or good, and how the third party was selected to provide the service or good. Accounts Payable Service –

Customer Billing Service –

Phone Service –

Purchasing Service –

IT Technical Support Service –

Customer Support Service –

Human Resources Support –

Financial Services –

Accounting Services –

Regulatory Service –

Legal Support Service –

Administrative Support –

GIS (Geographic Information System) Support Service –

Marketing Support –

Engineering Support –

Safety/OQ (Operational Qualification) Support Service –

Response: No, SUI provides these services to all affiliates.

Response provided by: Amanda Tolbert

Missouri Public Service Commission**Respond Data Request**

Data Request No.	0047
Company Name	Summit Natural Gas of Missouri, Inc.-Investor(Gas)
Case/Tracking No.	GO-2012-0322
Date Requested	12/10/2018
Issue	General Information & Miscellaneous - Affiliated Transactions
Requested From	Justina Waller
Requested By	Steve Dottheim
Brief Description	Shared Services
Description	Please provide a list of shared services and associated costs, if any, allocated to Missouri from 1) the Maine office and 2) the Arkansas office. Data Request submitted by Amanda McMellen (amanda.mcmellen@psc.mo.gov).
Response	Please see Data Request Response 17.1 which outlines the direct charges and allocation for each subsidiary for 2015, 2016, and 2017. The state an employee resides relative to shared services costs is not tracked because the location is not relevant to the allocation process.
Objections	NA

The attached information provided to **Missouri Public Service Commission** Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the **Missouri Public Service Commission** if, during the pendency of Case No. **GO-2012-0322** before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the **Summit Natural Gas of Missouri, Inc.-Investor(Gas)** office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to **Summit Natural Gas of Missouri, Inc.-Investor(Gas)** and its employees, contractors, agents or others employed by or acting in its behalf.

Security :	Public
Rationale :	NA