

In the Matter of the Application of)
Summit Natural Gas of Missouri, Inc.) File No. _____
for a Permanent Waiver From Certain)
Provisions of 4 CSR 240-40.030)

COMES NOW Summit Natural Gas of Missouri, Inc. (“SNGMO” or “Company”), pursuant to 4 CSR 240-2.060, 4 CSR 240-3.015, and 4 CSR 240-40.030(17) and, for its Application for Waiver, respectfully states as follows to the Missouri Public Service Commission (“Commission”).

1. SNGMO is a corporation duly incorporated under the laws of the State of Colorado with its principal offices located at 7810 Shaffer Parkway, Suite 120, Littleton, Colorado 80127. A copy of a certificate from the Missouri Secretary of State that SNG is authorized to do business in Missouri as a foreign corporation was submitted in Case No. GA-2012-0285, and is incorporated by reference in accordance with Commission Rule 4 CSR 240-2.060(1)(G). Other than cases that have been docketed at the Commission, SNGMO has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court within the past three (3) years that involve customer service or rates. SNGMO has no annual report or assessment fees that are overdue.

1

3. All correspondence, communications, notices, orders and decisions of the Commission with respect to this matter should be sent to the undersigned counsel and:

Martha Wankum
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Summit Natural Gas of Missouri, Inc.
312 East Capitol Avenue
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PRIOR WAIVER

4. On March 7, 2000, various members of the Missouri Association of Natural Gas Operators (MANGO) filed with the Commission, on behalf of certain named members, an application for a waiver from Commission Rule 4 CSR 240-40.030 (gas safety rule), pursuant to Commission Rule 4 CSR 240-40-030(16)¹. The Commission identified the application as Case No. GE-2000-543.

5. MANGO requested a permanent waiver, so long as certain specified alternative provisions are met, from a portion of the gas safety rules, which adopted the minimum federal safety standards as set out in the Code of Federal Regulations at 49 CFR Part 192. In particular, MANGO, sought a permanent waiver applicable to the provisions of 4 CSR 240-40.030(6)(H)3, which provides that a person must be re-qualified under an applicable plastic joining procedure if, during any twelve (12)-month period, that person does not make any joints under that procedure; or, if the person does make such joints, there are either three (3) joints or three percent (3%) of the joints made, whichever is greater, under that procedure that are found unacceptable by testing under subsection (10)(G) of the same rule.

¹ Now 4 CSR 240-40.030(17).

6. Gas corporations have found the standard concerning the specific joints made, concerned many practical difficulties in regard to tracking joints on an individual basis and to require unnecessary costs related to both mechanical and electrofusion joints. Accordingly, re-qualifying personnel under the first provision of 4 CSR 240-40.030(6)(H)3 is the much more practical approach. However, the “twelve (12) month period,” rather than calendar year, creates difficulties in tracking and scheduling the requalification.

7. Therefore, the application requested an alternative means of ensuring qualification for people making such joints in association with the permanent waiver. The alternative was as follows:

A person must be re-qualified under applicable procedures at least once each calendar year, but at intervals not exceeding 15 months. Following the initial qualification for electrofusion and mechanical joining procedures, for re-qualification a person must participate in a review on the proper joining procedures during such time period.²

8. On June 15, 2000, the Commission issued its *Order Granting Waiver* and, therein, found as follows:

The Commission finds that MANGO has provided a complete justification setting out the good cause for granting the variance in that MANGO will institute an alternative means of ensuring qualification for people making such joints as described above and that granting MANGO its requested waiver will serve the public interest by instituting alternative procedures which will ensure public safety. The Commission will grant the requested waiver.

9. The Commission Records Department was further directed to forward notice of the waiver granted to the U.S. Department of Transportation – Office of Pipeline Safety. By its letter dated July 20, 2000, the Acting Associate Administrator for Pipeline Safety of the Department of Transportation acknowledged receipt of that notice and further stated that the U.S. Department of Transportation concurred with the Commission conclusion and had no

² See *Order Granting Waiver*, MoPSC Case No. GE-2000-543 (June 15, 2000).

objection to the waiver.

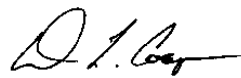
WAIVER

10. SNGMO did not exist at the time the referenced waiver was granted (although a predecessor company in part of SNGMO's service territory, Southern Missouri Gas Company, L.P., did exist and participate in the waiver application). However, it has the same issues as were described in Case No. GE-2000-543.

11. Therefore, SNGMO hereby requests that it be granted the permanent waiver from Commission Rule 4 CSR 240-40.030, as previously granted in Commission Case No. GE-2000-543, and subject to the alternative provision described above. Granting this waiver will continue to further cost-effectiveness and promote efficient training, thereby providing increased safety and economical service to customers. The alternative process utilized will ensure that the waiver will not compromise the safety of the natural gas pipeline system.

WHEREFORE, SNGMO respectfully requests the Commission to grant the Company a waiver from the requirements of Commission Rule 4 CSR 240-40.030, as described herein.

Respectfully submitted,



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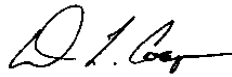
ATTORNEYS FOR SUMMIT NATURAL
GAS OF MISSOURI, INC.

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail to the following counsel this 4th day of November, 2014:

John Borgmeyer
Office of the General Counsel
Missouri Public Service Commission
Governor State Office Building
Jefferson City, Missouri 65101
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Marc Poston
Office of the Public Counsel
Governor State Office Building
Jefferson City, Missouri 65101
marc.poston@ded.mo.gov



VERIFICATION

STATE OF Colorado)
COUNTY OF Jefferson)

SS

I, Martha Wankum, state that I am Missouri Regulatory Manager of Summit Natural Gas of Missouri, Inc. (SNGMO); that I have read the above and foregoing document; that the statements contained therein are true and correct to the best of my information, knowledge and belief; and, that I am authorized to make this statement on behalf of SNGMO.

Martha Wankum

Subscribed and sworn to before me this 4th day of Nov, 2014.

Erin Campbell
Notary Public

My Commission Expires:

6/7/2016
(SEAL)

