

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

In the matter of the application of Summit Natural     )  
Gas of Missouri, Inc., for Approval of Its Cost     )     File No. \_\_\_\_\_  
Allocation Manual     )

**APPLICATION**

COMES NOW Summit Natural Gas of Missouri, Inc. (formerly known as Missouri Gas Utility, Inc.) (SNGMO or Applicant), by and through its counsel, and pursuant to 4 CSR 240-40.015, respectfully states as follows to the Missouri Public Service Commission (Commission):

**APPLICANT**

1.     SNGMO's principal office is located at 7810 Shaffer Parkway, Suite 120, Littleton, CO 80127.
2.     SNGMO is a corporation duly incorporated under the laws of the State of Colorado. A copy of a certificate from the Missouri Secretary of State that SNGMO is authorized to do business in Missouri as a foreign corporation was previously filed in Commission File No. GA-2012-0285 and is hereby incorporated by reference. SNGMO was formerly known as Missouri Gas Utility, Inc. 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.
3.     SNGMO conducts the business of a "gas corporation" and provides natural gas service in the Missouri counties of Harrison, Daviess, Caldwell, Dallas, Greene, Pettis, Polk, Webster, Laclede Wright, Douglas, Texas, Howell, Stone, Taney and Lawrence subject to the jurisdiction of the Missouri Public Service Commission (Commission). All correspondence,

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

Michelle A. Moorman  
Manager, Regulatory Affairs  
Summit Natural Gas of Missouri, Inc.  
7810 Shaffer Parkway, Suite 120  
Littleton, CO 80127  
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Facsimile: (303) 979-7892  
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### **CAM FILING**

4. In an effort “to prevent regulated utilities from subsidizing their non-regulated operations,” the Commission has implemented affiliate transaction rules which may be found at 4 CSR 240-40.015 for Gas Utilities. Rule 240-40.015(3)(D) provides that regulated gas corporations shall use a “Commission-approved CAM” for transactions involving the purchase of goods or services from an affiliated entity. The CAM attached hereto identifies how costs will be assigned or allocated to comply with this rule.

5. Further, Section 393.140(4), RSMo provides that the Commission shall have the power to prescribe uniform methods of keeping accounts, records, and books to be observed by regulated utilities and may prescribe, by order, forms of accounts, records, and memoranda to be kept by each regulated utility.

6. In Commission Case No. GM-2011-0354, concerning the merger of Southern Missouri Natural Gas Company, L.P., d/b/a Southern Missouri Natural Gas (SMNG) into Missouri Gas Utility, Inc. (MGU), the parties entered into a Unanimous Stipulation and Agreement. That Unanimous Stipulation and Agreement was filed with the Commission on September 15, 2011. It was approved by the Commission’s Order Approving Unanimous Stipulation and Agreement issued September 28, 2011, effective October 8, 2011.

7. Among other things, the Unanimous Stipulation and Agreement provided as follows – “MGU shall submit its CAM to the Commission for approval within six months after the Commission approves this Stipulation.” Stip., Sec. II.2., p. 5. SNGMO was formerly known as Missouri Gas Utility, Inc.

8. Pursuant to this provision, SNGMO makes this Application and has attached hereto as **Appendix A** its Cost Allocation Manual (CAM) (marked Highly Confidential in its entirety). SNGMO hereby requests approval of this CAM.

WHEREFORE, SNGMO respectfully requests an order from the Commission approving SNGMO’s Cost Allocation Manual.

Respectfully submitted,



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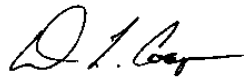
**ATTORNEYS FOR SUMMIT NATURAL GAS  
OF MISSOURI, INC.**

## **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail to the following this 28<sup>th</sup> day of March, 2012:

Office of the General Counsel  
Missouri Public Service Commission  
Governor State Office Building  
Jefferson City, Missouri 65101  
[gencounsel@psc.mo.gov](mailto:gencounsel@psc.mo.gov)

Office of the Public Counsel  
Governor State Office Building  
Jefferson City, Missouri 65101  
[opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov)



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**VERIFICATION**

STATE OF COLORADO    )  
                                      )  
COUNTY OF JEFFERSON    )       ss

I, Timothy R. Johnston, state that I am employed by Summit Natural Gas of Missouri, Inc. (SNGMO) as Executive Vice President; 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.

  
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Subscribed and sworn to before me this 27 day of March, 2012.



  
\_\_\_\_\_  
Notary Public

My Commission Expires:

January 4, 2013