

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

In the Matter of the Application of Summit Natural Gas of)
Missouri Inc., for Permission and Approval and a)
Certificate of Convenience and Necessity to Construct,)
Install, Own, Operate, Maintain, and Otherwise Control) File No. _____
and Manage a Natural Gas Distribution System to Provide)
Gas Service in Daviess County as an Expansion of its)
Existing Certificated Areas)

APPLICATION FOR CCN AND REQUEST FOR WAIVER

COMES NOW Summit Natural Gas of Missouri, Inc. (“SNGMO” or the “Company”), by and through its undersigned counsel, and, pursuant to RSMo. §393.170 and Commission Rules 4 CSR 240-2.060, 4 CSR 240-3.205, and 4 CSR 240-4.017, requests permission and approval and a certificate of convenience and necessity (“CCN”) to construct, install, own, operate, maintain, and otherwise control and manage a natural gas distribution system to provide gas service in Daviess County, Missouri, as a further expansion of its existing certificated area. In support thereof, SNGMO respectfully states as follows to the Missouri Public Service Commission (“Commission”):

1. SNGMO is a wholly owned subsidiary of Summit Utilities, Inc., and 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 SNGMO is authorized to do business in Missouri as a foreign corporation was submitted in Case No. GA-2012-0285 and is incorporated by reference. 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 years that involve customer service or rates. SNGMO has no annual report or assessment fees that are overdue.

2. SNGMO conducts business as a “gas corporation” and a “public utility” as those terms are defined in RSMo. §386.020, and provides natural gas service in the Missouri counties of Harrison, Daviess, Caldwell, Pettis, Benton, Morgan, Camden, Miller, Greene, Webster, Laclede, Wright, Douglas, Texas, Howell, Lawrence, Barry, Stone, and Taney, subject to the jurisdiction of the Commission as provided by law.

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

Matthew Kaply
Sr. Director Legislative and Regulatory Affairs
Summit Utilities Inc.
7810 Shaffer Pkwy., Ste. 120
Littleton, CO 80127
Telephone: 207-621-8000, ex. 1430
Email: mkaply@summitnaturalgas.com

Hannah Ahrendt
Regulatory Affairs Specialist II
Summit Utilities, Inc.
7810 Schaffer Pkwy. Ste. 120
Littleton, CO 80127
Telephone: 720-981-2123, ex. 1173
Email: hahrendt@summitutilitiesinc.com

4. SNGMO seeks a service area CCN for the area described in **Appendix A** and depicted on the map attached hereto as **Appendix B**. SNGMO holds a CCN for natural gas service for areas adjoining the service area being requested by this Application.

5. The requested CCN will allow SNGMO to serve a new development known as Lake Vikings in Caldwell and Daviess Counties. SNGMO already serves portions of these counties. To serve properties in the Daviess County portion of Lake Vikings, the Company will need to extend its facilities from the city of Gallatin. Natural gas service is not currently offered in this area by any unregulated entity or other regulated entity.

6. There are ten or more residents or landowners in the areas, and, as such, pursuant to Rule 4 CSR 240-3.205(1)(A)(2), a listing of the names and addresses of ten or more residents or landowners is attached hereto as **Appendix C - Confidential**. This appendix has been identified as Confidential pursuant to Commission Rule 4 CSR 240-2.135(2)(A)1 because it contains information relating directly to specific customers.

7. To provide natural gas service to the described area, SNGMO will need to install new facilities and engage in construction, but no new financing is required at this time. A feasibility study containing plans and specifications, the estimated cost of construction, and an estimate of the number of customers, revenues, and expenses for service to the area for the following three years is attached hereto as **Appendix D - Confidential**. This appendix has been identified as Confidential pursuant to Commission Rule 4 CSR 240-2.135(2)(A)5 because it contains confidential business information.

8. SNGMO holds all necessary franchises and permits from municipalities, counties, or other authorities that are required for SNGMO to serve the areas.

9. The rates for the proposed area will be those currently approved and in effect for services provided in SNGMO adjacent certificated territories under SNGMO's existing tariff. SNGMO plans to use the general terms and conditions of service found in SNGMO's currently approved tariffs.

10. The area SNGMO proposes to certificate has a need for a natural gas system and otherwise has no natural gas service available. SNGMO's experience in the operation of natural gas systems gives it the ability to provide this service in an efficient manner. For these reasons, a grant of the application will further the public convenience and necessity.

11. Commission Rule 4 CSR 240-4.017(1) provides that "(a)ny person that intends to

file a case shall file a notice with the secretary of the commission a minimum of sixty (60) days prior to filing such case.” No such notice was filed herein. As such, SNGMO seeks a waiver of the 60-day notice requirement.

12. Commission Rule 4 CSR 240-4.017(1)(D) provides that a waiver may be granted for good cause. In this regard, SNGMO declares (as verified below) that they have had no communication with the Office of the Commission (as defined in Commission Rule 4 CSR 240-4.015(10)) within the prior 150 days regarding any substantive issue likely to be in this case. Additionally, the area is in need of gas service, and a delay in filing this Application would delay construction and the ultimate provision of service.

WHEREFORE, SNGMO requests, for good cause shown, that the Commission waive the notice requirement of 4 CSR 240-4.017(1), approve this Application, and issue a CCN to SNGMO as set forth above. SNGMO requests such other and further relief as is just and proper under the circumstances.

BRYDON, SWEARENGEN & ENGLAND P.C.

By:

/s/ Diana C. Carter
Dean L. Cooper MBE #36592
Diana C. Carter MBE #50527
312 E. Capitol Avenue; P. O. Box 456
Jefferson City, MO 65102
Phone: (573) 635-7166
Fax: (573) 634-7431
E-Mail: DCarter@BrydonLaw.com

CERTIFICATE OF SERVICE

I hereby certify that the above and foregoing document was filed in EFIS on this 8th day of February, 2018, with notice of the same being sent to all counsel of record. I further certify that a copy of this document was sent by electronic transmission to the Staff of the Commission and to the Office of the Public Counsel.

/s/ Diana C. Carter

VERIFICATION

State of Colorado)
County of Jefferson) ss

I, Hannah Ahrencht, having been duly sworn and authorized to act on behalf of the Applicant, Summit Natural Gas of Missouri, Inc., state that I am the Regulatory Affairs Specialist for Summit Natural Gas of Missouri, Inc., that I have knowledge of the matters stated herein, and that the matters and things stated in the above Application and attached appendixes are true and correct to the best of my knowledge, information, and belief.

Subscribed and sworn before me this 8 day of February, 2018.

Melody Ann Evans
Notary Public

