

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

In the Matter of the Verified Application and)	
Petition of Liberty Energy (Midstates) Corp.)	Case No. GO-2014-0006
d/b/a Liberty Utilities to Change Its Infrastructure)	Tracking No. YG-2014-0181
System Replacement Surcharge.)	

STAFF RECOMMENDATION

COMES NOW the Staff (“Staff”) of the Missouri Public Service Commission (“Commission”), by and through counsel, and in response to the Commission’s October 16, 2013 *Report and Order* (the “Order”) submits its *Staff Recommendation* as set forth herein and in the attached Staff Recommendation Memorandum (which is incorporated herein by this reference), and in support thereof respectfully states as follows:

1. On July 2, 2013, Liberty Energy (Midstates) Corp. d/b/a Liberty Utilities (“Liberty”) filed an application and petition with the Commission to change its Infrastructure System Replacement Surcharge (“ISRS”). The Commission suspended the tariff filed by Liberty with its application and petition until October 30, 2013.

2. On September 9, 2013, the Office of the Public Counsel (“OPC”) filed a motion requesting that the Commission reject Liberty’s petition or schedule an evidentiary hearing. The Commission held an evidentiary hearing on September 26, 2013 in response to the OPC request for hearing. The parties filed briefs on October 4, 2013, and on October 16, 2013 the Order was issued.

3. The Order denied OPC’s motion to deny or reject the application and petition filed on July 2, 2013 by Liberty. The Order also authorized a change to Liberty’s ISRS and ordered Liberty to make a tariff filing in compliance with the Order

by 12:00 p.m. (noon) on October 17, 2013. It also ordered Staff to file its recommendation regarding Liberty's compliance tariff filing on October 17, 2013.

4. Liberty made its compliance tariff filing during the evening of October 16, 2013. Liberty also filed a Motion for Expedited Treatment requesting that the compliance tariff filing be allowed to go into effect on less than thirty (30) days' notice, specifically on October 30, 2013. As reflected in the attached Staff Recommendation Memorandum, Staff has reviewed the compliance tariff filing made by Liberty, and is of the opinion that the tariff filing is in compliance with the Commission's Order.

5. Staff is also of the opinion that good cause exists to allow the tariff filing to go into effect on less than thirty (30) days' notice, specifically on October 30, 2013, since the Commission has authorized Liberty to collect the changed ISRS and to make a tariff filing reflecting that change, as reflected in the Order.

6. As shown in the attached Staff Recommendation Memorandum, Staff has verified that Liberty has filed its annual report and is not delinquent on any assessment. Staff is not aware of any other matter before the Commission that affects, or is affected by this filing.

WHEREFORE, Staff recommends that the Commission issue an order approving the following tariff sheet filed by Liberty on October 16, 2013, to become effective on October 30, 2013, and making such further orders as the Commission deems proper:

P.S.C. MO. No. 2

6th Revised Sheet No. 19, Cancelling 5th Revised Sheet No. 19

Respectfully submitted,

/s/ Jeffrey A. Keevil

Jeffrey A. Keevil
Missouri Bar No. 33825

John D. Borgmeyer
Missouri Bar No. 61992

Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 526-4887 (Telephone)
(573) 751-9285 (Fax)
jeff.keevil@psc.mo.gov
john.borgmeyer@psc.mo.gov

Attorneys for the Staff of the
Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 17th day of October, 2013.

/s/ Jeffrey A. Keevil

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. GO-2014-0006 / Tracking No. YG-2014-0181– Liberty Utilities

FROM: Thomas M. Imhoff, Tariffs/Rate Design Unit - Energy

/s/ Thomas M. Imhoff 10/17/13
Project Coordinator / Date

/s/ Jeff Keevil 10/17/13
Staff Counsel's Office / Date

SUBJECT: Staff's Recommendation on the Tariff Sheet Filed in Compliance with
Commission Order and Liberty Utilities' MOTION FOR EXPEDITED
TREATMENT

DATE: October 17, 2013

On October 16, 2013, the Missouri Public Service Commission ("Commission") issued its REPORT AND ORDER ("Order") directing Liberty Utilities ("Liberty" or "Company") to file a new tariff sheet to recover the revenue authorized in its Order no later than 12:00 p.m. on October 17, 2013.

On October 16, 2013, Liberty filed a tariff sheet with the Commission with a proposed effective date of November 15, 2013. This tariff sheet was "Appendix A" to Liberty's MOTION FOR EXPEDITED TREATMENT (Motion) relating to Case No.GO-2014-0006. The Motion requested an effective date of October 30, 2013.

In its Order, the Commission directed the Staff to file its recommendation no later than October 17, 2013. This filing is Staff's recommendation.

Staff has reviewed Liberty's tariff sheet and accompanying Motion and has determined that Liberty's newly submitted ISRS tariff sheet (YG-2014-0181) complies with those prescribed rates authorized by the Commission's Order. Staff has no objection to the expedited request of Liberty.

Staff has verified that Liberty has filed its annual report and is not delinquent on any assessment. Staff is not aware of any other matter before the Commission that affects, or is affected by this filing.

Therefore, Staff recommends that the Commission issue an order approving the following tariff sheet, as filed on October 16, 2013, to go into effect on October 30, 2013, as requested by Liberty.

P.S.C. MO. No. 2

6th Revised Sheet No. 19, Canceling 5th Revised Sheet No. 19

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

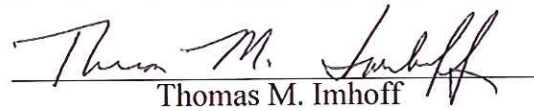
In the Matter of the Verified Application)
and Petition of Liberty Energy (Midstates))
Corp. d/b/a Liberty Utilities to Change Its)
Infrastructure System Replacement)
Surcharge)

Case No. GO-2014-0006

AFFIDAVIT OF THOMAS M. IMHOFF

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Thomas M. Imhoff, of lawful age, on oath states: that he participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was provided to him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief.



Thomas M. Imhoff

Subscribed and sworn to before me this 17th day of October, 2013.

LAURA BLOCH
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: June 21, 2015
Commission Number: 11203914



Notary Public