

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

In the Matter of the Verified Application and	)	
Petition of Liberty Energy (Midstates) Corp.	)	<b><u>Case No. GO-2014-0006</u></b>
d/b/a Liberty Utilities to Change Its Infrastructure	)	Tariff File No. YG-2014-0004
System Replacement Surcharge.	)	

**STAFF UPDATED STATEMENT OF POSITION ON ISSUES**

COMES NOW the Staff (“Staff”) of the Missouri Public Service Commission (“Commission”), by and through the undersigned counsel, and for its Updated Statement of Position on Issues respectfully states as follows:

1. Staff filed its Staff Statement of Position on Issues on September 24, 2013, pursuant to the Commission’s *Order Establishing Procedural Schedule and Other Procedural Requirements* (the “Order”). In that Statement of Position Staff stated that the figures contained therein would likely change, due to certain information Staff received from the Company too late to include in Staff’s prefiled *Updated Report*, and that Staff will present its adjusted figures at the hearing. Staff further stated that it would file an updated Statement of Position prior to the hearing if it was able in order to advise the Commission and parties of the updated figures prior to hearing. Staff is therefore submitting this Updated Statement of Position on Issues to reflect the new information received from the Company.

**Issue 1:** Should the Commission approve an incremental ISRS (infrastructure system replacement surcharge) revenue requirement increase for Liberty Utilities in this case?

**Staff Position:** Yes, the Commission should approve an incremental ISRS revenue requirement increase for Liberty Utilities in this case, although not as much as Liberty Utilities sought in its filing herein.

**Issue 2: (i)** What amount of incremental ISRS revenue requirement increase should the Commission approve for Liberty Utilities in this case (total and by district)

**Staff Position:** The Commission should approve an incremental ISRS revenue requirement increase in the amount of annual pre-tax revenues of \$579,662 (total increase this case), consisting of \$30,432 for the WEMO district, \$178,799 for the SEMO district, and \$370,430 for the NEMO district. Such an increase would result in a cumulative ISRS Revenue Requirement for Liberty Utilities of \$1,332,023.

**Issue 2: (ii)** what composite/cumulative ISRS rate should Liberty Utilities be authorized to file for each customer class by district based on such increase?

**Staff Position:** Liberty Utilities should be authorized to file composite ISRS rates for each customer class by district as shown on Schedule JM-1 Updated, as follows:

<u>Northeast District</u>	<u>ISRS Charge</u>
Firm residential	\$3.16
Small Firm GS	\$3.16
Medium Firm GS	\$13.94
Large Firm GS	\$69.71
Interruptible Large Volume	\$69.71
 <u>Southeast District</u>	
Firm Residential	\$1.04
Small Firm GS	\$1.04
Medium Firm GS	\$7.56
Large Firm GS	\$37.82
Interruptible Large Volume	\$37.82

West District

Firm Residential	\$1.97
Small Firm GS	\$1.97
Medium Firm GS	\$9.78
Large Firm GS	\$48.92

**WHEREFORE** Staff respectfully submits this Updated Statement of Position.

Respectfully submitted,

**/s/ Jeffrey A. Keevil**

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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 25th day of September, 2013.

**/s/ Jeffrey A. Keevil**