

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

In the Matter of Liberty Utilities)	<u>Case No. GT-2021-XXXX</u>
(Midstates Natural Gas Corp.) Proposed)	Tariff Filing No. JG-2021-0042
Tariff Sheet Filing)	

MOTION TO SUSPEND TARIFF SHEET

COMES NOW the Staff of the Missouri Public Service Commission and for its *Motion to Suspend Tariff Sheet* (“Motion”) respectfully states as follows:

1. On August 19, 2020, Liberty Utilities (Midstates Natural Gas Corp.) (“Liberty” or “Company”) filed a revised tariff sheet, Form No. 13 P.S.C. MO. No. 2, 2nd Revised Sheet No. 67 (Tariff Filing No. JG-2021-0042) bearing an effective date of September 18, 2020. The tariff sheet was filed for the purpose of changing a weather station used to generate data for determining the Company’s Weather Normalization Adjustment Rider (“WNAR”) rate to be charged to Liberty’s customers.

2. In accordance with Commission Rule 20 CSR 4240-2.065, Staff moves the Commission to suspend the tariff sheet filing and create a docketed case so that Staff may have an opportunity to review the requested change in weather station and its possible effect on the Company’s WNAR. For Staff to prepare an informed recommendation to the Commission on this matter, Staff needs additional time for discovery. Staff anticipates filing its recommendation by September 18, 2020.

WHEREFORE Staff respectfully requests that the Commission issue an order suspending tariff sheet (Tariff Filing No. JG-2021-0042) and creating a docketed case file.

Respectfully submitted,

/s/ Robert S. Berlin

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record this 21st day of August, 2020.

/s/ Robert S. Berlin