

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

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

STAFF EXHIBIT LIST OF PREFILED EXHIBITS

COMES NOW the Staff (“Staff”) of the Missouri Public Service Commission (“Commission”), by and through the undersigned counsel, and in response to the *Order Establishing Procedural Schedule and Other Procedural Requirements* issued herein on September 13, 2013 (the “Order”) respectfully submits the following:

1. The Order provided in paragraph 2.K. that

Each party shall prepare a comprehensive exhibit list before the evidentiary hearing with the listed exhibits numbered sequentially as directed in paragraph J. Copies of the exhibit lists shall be provided to the Commissioners and the Regulatory Law Judge at least two days prior to the hearing and to the Court Reporter at the beginning of the hearing.

2. As stated in the *Staff Updated Report on Infrastructure System Replacement Surcharge for Liberty Utilities* (beginning on page 4 line 18) filed herein on September 20, 2013, Staff was informed on September 19, 2013, that the Company had discovered “some double-counting of materials and supplies dollars related to eligible replacements when performing an internal audit of all line items charges related to the projects for which it is seeking recovery through the ISRS” and that the Company intended to address this in its testimony to be filed on September 20, 2013. Given the timing of when this matter was brought to the attention of Staff, this adjustment was not reflected in the *Staff Updated Report on Infrastructure System Replacement Surcharge*

for *Liberty Utilities*, and Staff indicated that it would provide its response to the updated information at the hearing. In addition to the foregoing, Staff was also informed (through Company's Supplemental Response to a data request) late in the day on September 19, 2013, of a misallocation of costs due to an imbalance between the Company's ledger and sub-ledger. Given the timing of when this matter was brought to the attention of Staff, any adjustments necessitated by this misallocation of costs were also not reflected in the *Staff Updated Report on Infrastructure System Replacement Surcharge for Liberty Utilities*, and Staff will provide its response to this information at the hearing.

3. At the hearing, Staff *may* be able to present the results of its review of the new information set forth in paragraph 2 in the form of documentary exhibits (rather than simply via oral testimony) in order to be clearer for the Commission, Regulatory Law Judge and other parties. However, at this time Staff is unable to include those *potential* exhibits in this Exhibit List. Therefore, this Exhibit List will include only those items prefiled to date by Staff. Staff mentions the matters discussed in paragraph 2 simply to explain why it may have exhibits at the hearing, prepared by Staff witnesses, which are not included in this Exhibit List.

4. At this time, based on its prefiled exhibits only, Staff submits the following Exhibit List of Prefiled Exhibits:

Staff Exhibit No. 1 – *Staff Updated Report on Infrastructure System Replacement Surcharge for Liberty Utilities* (supporting witnesses: Grissum, Imhoff, and McNutt)

WHEREFORE, Staff respectfully requests the Commission accept this Staff Exhibit List of Prefiled Exhibits in response to the *Order Establishing Procedural Schedule and Other Procedural Requirements*.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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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 all counsel of record this 23rd day of September, 2013.

/s/ Jeffrey A. Keevil