BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Liberty Utilities (Midstates Natural)
Gas) Corp. d/b/a Liberty Utilities' Tariff Revisions) Case No. GR-2014-0152
Designed to Implement a General Rate Increase for) Tracking No. YG-2015-0216
Natural Gas Service in the Missouri Service Areas)
of the Company.	

STAFF RECOMMENDATION TO APPROVE TARIFF SHEETS

COMES NOW the Staff of the Missouri Public Service Commission and for its recommendation to approve compliance tariffs filed by Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Utilities ("Liberty" or "Company") respectfully states as follows:

- 1. On December 3, 2014, the Commission issued its *Report and Order* in this case which approved an increase in Liberty's overall Missouri jurisdictional gross annual natural gas revenues of approximately \$4.87 million. In the Commission's *Report and Order*, Liberty was ordered to file tariff sheets in compliance with the *Report and Order* no later than December 10, 2014, and Staff was ordered to file a recommendation regarding those compliance tariff sheets no later than December 11, 2014.
- 2. On December 4, 2014, Staff filed a Staff Motion for Extension of Time to File Recommendation and Request for Expedited Treatment ("Motion") in which Staff sought an extension to December 15, 2014, to file its recommendation regarding Liberty's compliance tariff sheets. In response to Staff's Motion, the Commission issued an Order Granting Staff Motion for Extension of Time to File Recommendation and Order Granting Request for Expedited Treatment in which the Commission extended the date by which Staff was to file its recommendation regarding Liberty's compliance tariff sheets to December 15, 2014.

- 3. On December 5, 2014, Liberty filed tariff sheets to comply with the *Report and Order*, with a proposed effective date of January 4, 2015. On December 10, 2014, Liberty filed five substitute tariff sheets to reflect changes suggested by Staff. On December 11, 2014, Liberty filed one additional substitute tariff sheet to reflect changes suggested by Staff.
- 4. As explained in Staff's *Memorandum*, which is attached hereto and incorporated herein by reference, Staff has reviewed the tariff sheets filed by Liberty on December 5, 2014, and as substituted on December 10, 2014, and December 11, 2014, and is of the opinion that these sheets are in compliance with the Commission's *Report and Order* in this case. Staff has also verified that Liberty has filed its annual report and is not delinquent on any assessment.

WHEREFORE, Staff recommends the following tariff sheets, filed on December 5, 2014, and as substituted on December 10, 2014, and December 11, 2014, with an effective date of January 4, 2015, be approved:

P.S.C. MO. No. 2

^{2&}lt;sup>nd</sup> Revised SHEET NO. 2, Cancelling 1st Revised SHEET NO. 2

^{7&}lt;sup>th</sup> Revised SHEET NO. 19, Cancelling 6th Revised SHEET NO. 19

^{1&}lt;sup>st</sup> Revised SHEET NO. 20, Cancelling Original SHEET NO. 20

^{2&}lt;sup>nd</sup> Revised SHEET NO. 21, Cancelling 1st Revised SHEET NO. 21

^{3&}lt;sup>rd</sup> Revised SHEET NO. 22, Cancelling 2nd Revised SHEET NO. 22

^{2&}lt;sup>nd</sup> Revised SHEET NO. 23, Cancelling 1st Revised SHEET NO. 23

^{3&}lt;sup>rd</sup> Revised SHEET NO. 24, Cancelling 2nd Revised SHEET NO. 24

^{2&}lt;sup>nd</sup> Revised SHEET NO. 25, Cancelling 1st Revised SHEET NO. 25

^{3&}lt;sup>rd</sup> Revised SHEET NO. 26, Cancelling 2nd Revised SHEET NO. 26

^{3&}lt;sup>rd</sup> Revised SHEET NO. 28, Cancelling 2nd Revised SHEET NO. 28

^{2&}lt;sup>nd</sup> Revised SHEET NO. 30, Cancelling 1st Revised SHEET NO. 30

^{1&}lt;sup>st</sup> Revised SHEET NO. 52, Cancelling Original SHEET NO. 52

^{1&}lt;sup>st</sup> Revised SHEET NO. 54, Cancelling Original SHEET NO. 54

^{1&}lt;sup>st</sup> Revised SHEET NO. 55, Cancelling Original SHEET NO. 55

¹st Revised SHEET NO. 58, Cancelling Original SHEET NO. 58

^{1&}lt;sup>st</sup> Revised SHEET NO. 59, Cancelling Original SHEET NO. 59 Original SHEET NO. 59.1

Original SHEET NO. 59.2
Original SHEET NO. 59.3
Original SHEET NO. 59.4
Original SHEET NO. 59.5

1st Revised SHEET NO. 60, Cancelling Original SHEET NO. 60
1st Revised SHEET NO. 61, Cancelling Original SHEET NO. 61
1st Revised SHEET NO. 62, Cancelling Original SHEET NO. 62
1st Revised SHEET NO. 66, Cancelling Original SHEET NO. 66

Respectfully submitted,

/s/ Jeffrey A. Keevil

Jeffrey A. Keevil
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Attorney for the Staff of the
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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 for all parties of record this 15th day of December, 2014.

/s/ Jeffrey A. Keevil

MEMORANDUM

TO: Missouri Public Service Commission Official Case File,

Case No. GR-2014-0152, File No. YG-2015-0216, Liberty Utilities (Midstates

Natural Gas) Corp. d/b/a Liberty Utilities

FROM: Thomas M. Imhoff, Energy Unit – Tariff, Safety, Economic and Engineering

Analysis Department

/s/ Thomas M Imhoff 12/15/14 /s/ Jeff Keevil 12/15/14
Energy Unit/Date Staff Counsel's Office/Date

SUBJECT: Staff Recommendation On Liberty Utilities (Midstates Natural Gas) Corp. d/b/a

Liberty Utilities' Tariff Sheets Filed to Comply with the Commission's Report

and Order

DATE: December 15, 2014

On December 3, 2014, the Missouri Public Service Commission ("Commission") issued its Report and Order in Case No. GR-2014-0152, the Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Utilities ("Liberty" or "Company") natural gas rate case. This order approved an increase in Liberty's overall Missouri jurisdictional gross annual natural gas revenues of approximately \$4.87 million.

On December 4, 2014 the Staff of the Commission filed a STAFF MOTION FOR EXTENSION OF TIME TO FILE RECOMMENDATION AND REQUEST FOR EXPEDITED TREATMENT. In the Commission's Report and Order, Liberty was ordered to file compliance tariff sheets by December 10, 2014, with the Staff of the Commission filing a recommendation regarding those compliance tariff sheets by December 11, 2014. This would not have been enough time for a thorough review of the filed tariff sheets, and not allow enough time to file substitute tariff sheets if needed.

On December 4, 2014, the Commission issued an ORDER GRANTING STAFF MOTION FOR EXTENSION OF TIME TO FILE RECOMMENDATION AND ORDER GRANTING REQUEST FOR EXPEDITED TREATMENT in which the Commission extended the date by which Staff was to file its recommendation regarding Liberty's compliance tariff sheets to December 15, 2014.

On December 5, 2014, Liberty filed tariff sheets to comply with the Report and Order. On December 10, 2014, Liberty filed five substitute tariff sheets to reflect changes suggested by the Energy Unit – Tariff, Safety, Economic and Engineering Analysis Department ("Staff"). On December 11, 2014, Liberty filed one substitute tariff sheet to reflect additional changes suggested by Staff.

MO PSC Case No. GR-2014-0152 OFFICIAL CASE FILE MEMORANDUM PAGE 2 OF 2

The Staff has reviewed the tariff sheets filed by Liberty on December 5, 2014, and as substituted on December 10, 2014, and December 11, 2014, and is of the opinion that these sheets are in compliance with the Commission's Report and Order in this case.

Staff has verified that Liberty has filed its annual report and is not delinquent on any assessment. Therefore, Staff recommends the following tariff sheets, filed on December 5, 2014, and as substituted on December 10, 2014, and December 11, 2014, with an effective date of January 4, 2015 be approved:

P.S.C. MO. No. 2

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2<sup>nd</sup> Revised SHEET NO. 2, Cancelling 1<sup>st</sup> Revised SHEET NO. 2
7<sup>th</sup> Revised SHEET NO. 19, Cancelling 6<sup>th</sup> Revised SHEET NO. 19
1<sup>st</sup> Revised SHEET NO. 20, Cancelling Original SHEET NO. 20
2<sup>nd</sup> Revised SHEET NO. 21, Cancelling 1<sup>st</sup> Revised SHEET NO. 21
3<sup>rd</sup> Revised SHEET NO. 22, Cancelling 2<sup>nd</sup> Revised SHEET NO. 22
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3<sup>rd</sup> Revised SHEET NO. 24, Cancelling 2<sup>nd</sup> Revised SHEET NO. 24
2<sup>nd</sup> Revised SHEET NO. 25, Cancelling 1<sup>st</sup> Revised SHEET NO. 25
3<sup>rd</sup> Revised SHEET NO. 26, Cancelling 2<sup>nd</sup> Revised SHEET NO. 26
3<sup>rd</sup> Revised SHEET NO. 28, Cancelling 2<sup>nd</sup> Revised SHEET NO. 28
2<sup>nd</sup> Revised SHEET NO. 30, Cancelling 1<sup>st</sup> Revised SHEET NO. 30
1<sup>st</sup> Revised SHEET NO. 52, Cancelling Original SHEET NO. 52
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1<sup>st</sup> Revised SHEET NO. 58, Cancelling Original SHEET NO. 58
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1<sup>st</sup> Revised SHEET NO. 62, Cancelling Original SHEET NO. 62
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1st Revised SHEET NO. 66, Cancelling Original SHEET NO. 66

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Utilities' Tariff Revisions Designed to Implement a General Rate Increase for Natural Gas Service in the Missouri Service Areas of the Company)) Case No. GR-2014-0152)	
AFFIDAVIT OF THOMAS M. IMHOFF		
STATE OF MISSOURI) ss) ss)		
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.		
•	Thun M. Jull Thomas M. Imhoff	
Subscribed and sworn to before me this 15th day of December, 2014.		
CHERYL L. WRIGHT My Commission Expires January 26, 2015 Cole County	Hery D. Twight Notary Public	