

**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**

**STAFF MOTION FOR EXTENSION OF TIME TO FILE RECOMMENDATION  
AND REQUEST FOR EXPEDITED TREATMENT**

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through counsel, and for its Motion for Extension of Time to File Recommendation and Request for Expedited Treatment respectfully states as follows:

1. On December 3, 2014, the Commission issued its Report and Order ("Order") in this case, directing Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Utilities ("Liberty") to file tariff sheets that comport with the Order no later than December 10, 2014, and directing Staff file a recommendation regarding those tariffs no later than December 11, 2014, the day after Liberty has been ordered to file the tariff sheets.

2. This schedule does not allow sufficient time for Staff to review the approximately 25 tariff sheets it anticipates Liberty will file, and then prepare and file a recommendation concerning those tariffs.

3. Liberty has indicated it intends to file compliance tariffs prior to December 10. If so, Staff will still need an extension of time because Staff must independently calculate Liberty's new rates based on the Commission's ordered revenue requirement. Due to the press of other business—specifically, the Staff assigned to this matter are also preparing direct testimony due to be filed December 5

and December 19 in Ameren Missouri's rate case, ER-2014-0258—Staff will not have sufficient time to properly calculate the appropriate rates for Liberty by December 11. Without that independent calculation, Staff will not be able to verify that all the rate elements result in the proper total revenue requirement in compliance with the Commission's Order. Staff cannot complete these calculations until sometime next week.

4. In addition, upon receiving the filed version of the tariffs, Staff will need to review every word and punctuation mark on every tariff sheet and make numerous comparisons to ensure that they comply with the Order, as well as the tariff filings agreed upon in the stipulations which were approved as part of this case.

5. Once Staff is able to compute the appropriate rates pursuant to the Order, Staff will still need to compare the computed rates to the tariffs to be filed by Liberty. In addition to the tariff sheets containing customer rates, Liberty will need to file—and Staff will need to review—several other tariff sheets which do not affect the rates themselves. Staff will also need to ensure that the filed tariff sheets have the proper tariff numbering and tariff series of replacements. After all of this is completed, Staff will then need to prepare a memorandum with its recommendation regarding the filed tariff sheets.

6. Moreover, an extension of time will give the parties the opportunity to resolve any disputes that may arise during the review process.

7. Given that the Order requires Staff to file its recommendation on December 11, Staff is requesting expedited treatment of this motion pursuant to 4 CSR 240-2.080(14). The Order was issued December 3, so this pleading is being filed as soon as it could have been under the circumstances. There will be no negative effect

on Liberty's customers or the general public if this request is granted. In fact, allowing Staff additional time to file its recommendation will be beneficial to those customers and the public by allowing for a more thorough review than the Order would allow and may actually prevent further delay in the event that Staff's review discovers a problem with the tariff sheet(s) by allowing for substitute tariff(s) to be filed, which would not be possible under the Order.

8. Staff requests that the Commission grant Staff an extension of time until December 15 to file its review, and until December 16 for any other party to file an objection. Such an extension of time in this matter will not cause any additional delay, because the Commission's next agenda session will not be held until December 17.

9. Liberty has indicated it does not object to this Motion.

10. Therefore, in order to allow Staff sufficient time to properly review the tariffs yet to be filed by Liberty and prepare and file an appropriate recommendation, Staff requests that it be allowed to file its recommendation concerning Liberty's compliance tariff sheets no later than December 15, and that the Commission order any other party to file any objection no later than December 16. Pursuant to 4 CSR 240-2.080(14) Staff is requesting that the Commission act on this Motion by Monday December 8, 2014, or as close thereto as possible, since the Order currently requires Staff to file the recommendation on December 11.

**WHEREFORE**, Staff respectfully requests that the Commission: (1) issue an order granting Staff until December 15, 2014, to file its recommendation regarding Liberty's compliance tariffs; (2) issue an order directing any other party to file any

objection no later than December 16, 2014; (3) issue such order by December 8, 2014, or as close thereto as possible.

Respectfully submitted,

**/s/ John D. Borgmeyer**

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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 4<sup>th</sup> day of December, 2014.

**/s/ John D. Borgmeyer**