

**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' ) **Case No. GR-2015-0095**  
Purchased Gas Adjustment Tariff Filing )

**STAFF REPLY TO LIBERTY UTILITIES' RESPONSE  
TO STAFF ACA RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission in the above-captioned matter and submits the attached Staff Memorandum in both Highly Confidential and Public versions as its Reply to the Response filed herein by Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Utilities ("Liberty" or "Company") to the Recommendation filed by Staff concerning Liberty's 2013-2014 ACA filing. In support thereof, Staff further states as follows:

1. Staff filed its ACA Recommendation in this case concerning Liberty's 2013-2014 ACA filing on December 4, 2015.

2. Liberty filed its Response to the Staff Recommendation on January 21, 2016.

3. As reflected in the attached Staff Memorandum which is incorporated herein by reference, although Staff accepts most of Liberty's responses to the items set forth in the Staff Recommendation, Staff does have concerns with certain aspects of Liberty's responses to two of the items related to Reliability Analysis and Gas Supply Planning (Sections II.B.1 and II.B.3b). These items are discussed in greater detail in the attached Staff Memorandum.

4. However, the only item on which Staff requests a Commission Order is the adjustment of the ACA account balances, discussed in Section I of the attached Staff Memorandum.

**WHEREFORE** Staff respectfully submits the attached Reply to Liberty's Response to Staff's ACA Recommendation and further requests that the Commission issue an order requiring Liberty to adjust the ACA account balances in its next ACA filing to reflect the Staff adjustments and to reflect the (over)/under-recovered ACA balances in the "Staff Balances" column of the table set forth in Section I of the Staff Memorandum attached hereto.

Respectfully submitted,

**/s/ Jeffrey A. Keevil**

Jeffrey A. Keevil  
Missouri Bar No. 33825  
Attorney for the Staff of the  
Missouri Public Service  
Commission  
P. O. Box 360  
Jefferson City, MO 65102  
(573) 526-4887 (Telephone)  
(573) 751-9285 (Fax)  
Email: jeff.keevil@psc.mo.gov

**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 29<sup>th</sup> day of January, 2016.

**/s/ Jeffrey A. Keevil**