

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

In the Matter of Liberty Utilities (Midstates	)	
Natural Gas) Corp.'s d/b/a Liberty (MNG)	)	
Application for Authority to Issue Long Term	)	<b><u>File No. GF-2023-0280</u></b>
Unsecured Debt	)	

**THIRD MOTION FOR EXTENSION TO FILE STAFF RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”) and for its *Third Motion for Extension to File Staff Recommendation*, states as follows:

1. On March 7, 2023, Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty (hereafter, “Liberty Midstates” or the “Company”), filed a *Financing Application and Request for Waiver (“Application”)* with the Commission pursuant to § 393.200, RSMo, and 20 CSR 4240-2.060, 2.080, and 10.125.

2. On March 9, 2023, the Commission issued an *Order* directing Staff to file a recommendation regarding Liberty Midstates’ *Application* or a status report informing the Commission when a recommendation would be filed no later than March 29, 2023.

3. On March 27, 2023, Staff filed a *Status Report and Motion for Extension* requesting an additional 30 days in which to issue data requests (DRs), send follow-up data requests, and further review information from the Company.

4. The Commission granted the Staff’s *Motion for Extension* and ordered the Staff file a recommendation in this matter by April 26, 2023<sup>1</sup>.

5. Since then, Staff submitted additional and follow-up DRs to Liberty Midstates and held discussions with the Company and is now in the process of reviewing the information received from the Company.

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<sup>1</sup> *Order Granting Staff’s Motion for an Extension of Time to File a Recommendation and Setting Time for Response*, issued March 29, 2023, and effective March 29, 2023.

6. On April 24, 2023, Staff filed another *Motion for Extension to File Staff Recommendation*, requesting an additional 30 days within which to complete its investigation and review. That Motion was granted on April 25, 2023, and the Staff was ordered to file its recommendation no later than May 26, 2023<sup>2</sup>.

7. On May 19, 2023, Liberty Midstates filed an *Amended Financing Application* which “replaces the original Financing Application and Request for Waiver in total.” It also requested “that Staff be relieved of the obligation to file a recommendation regarding the original Financing Application and Request for Waiver as currently scheduled and that Staff be directed to file a recommendation within thirty days after the filing of this Amended Financing Application.”

8. In tandem with the Company’s May 19, 2023 *Amended Financing Application* and request and to provide Staff sufficient time to review the Company’s filing and additional information provided to it as a result, Staff specifically requests an additional 30 days in which to complete and file its response and recommendation to Liberty Midstates Amended Application.

9. This Motion is made in the interest of justice and without the intent to unreasonably delay or hinder these proceedings in any manner

**WHEREFORE**, Staff respectfully submits this *Third Motion for Extension to File Staff Recommendation* for the Commission’s information and consideration and hereby prays the Commission grant Staff an additional 30 days within which to file its recommendation in this matter; and to grant such other and further relief as the Commission considers just and reasonable under the circumstances.

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<sup>2</sup> *Order Granting Staff’s Second Motion for an Extension of Time to File Recommendation* issued April 25, 2023, and effective April 25, 2023.

Respectfully submitted,

**/s/ Carolyn H. Kerr**

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### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile, or electronically mailed to all parties and/or counsel of record on this 24th day of May, 2023.

**/s/ Carolyn H. Kerr**