

**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 ) **File No. GF-2023-0280**  
Unsecured Debt )

**MOTION FOR EXTENSION  
TO FILE STAFF RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”) and for its *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.

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

6. In order to provide sufficient time to conduct that discovery, analyze newly acquired data and information from the Company, and complete its investigation, Staff requests an additional 30 days in which to complete and file its recommendation. That being said, Staff will endeavor to complete its review prior to any newly-established filing date.

7. Counsel for Liberty Midstates and the Office of the Public Counsel have been contacted regarding this Motion, and neither party objects to the granting of an extension of time in this matter.

8. 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 *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.

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 24<sup>th</sup> day of April, 2023.

**/s/ Carolyn H. Kerr**