

**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) Fuel Costs Related to the Extraordinary Weather Event of February 2021)
)
) **File No. GU-2021-0276**
)

**APPLICATION TO INTERVENE BY
SYMMETRY ENERGY SOLUTIONS, LLC**

COMES NOW Symmetry Energy Solutions, LLC (“Symmetry”), by and through counsel, pursuant to Missouri Public Service Commission (“Commission”) rule 20 CSR 4240-2.075, and files its Application to Intervene in the referenced case. In support thereof, Symmetry states as follows:

1. On August 25, 2021, Liberty Utilities (Midstates Natural Gas) Corp. (“Liberty”) filed an application requesting an Accounting Authority Order (“AAO”) regarding costs incurred during the extreme weather event of February 2021.
2. On August 27, 2021, the Commission issued its *Order Directing Notice, and Setting Deadline for Intervention Applications*, which set an intervention deadline of September 17, 2021.
3. As part of its AAO request, Liberty has proposed determining the cost of the natural gas used during Winter Storm Uri. This determination is also the subject of litigation in GC-2022-0062.
4. Symmetry’s interest is different than those of the general public, and may be adversely affected by a final order from this Commission in this case. Symmetry wishes to ensure that both it and its customers’ interest in affordable and reliable natural gas are preserved

for the future, that Symmetry has the ability to appropriately plan for the future, and that Symmetry is not disadvantaged or otherwise economically disadvantaged by Liberty's current request. Such interests are not currently represented at this time.

5. Symmetry expects to develop its position on specific issues as the case develops, and takes no position on the filing at this time.

6. Granting intervention to Symmetry would serve the public interest by allowing Symmetry to examine these issues that are significant from a policy and public interest from its unique perspective.

7. Pleadings, notices and other correspondence in this case should be directed to undersigned counsel.

WHEREFORE, Symmetry prays that this Commission issue an order granting its application to intervene in this proceeding and for such other orders and relief as may be appropriate in the circumstances.

Respectfully Submitted,

By: /s/ Douglas L. Healy

Douglas L. Healy, # 51630

Terry M. Jarrett, #45663

3010 East Battlefield

Springfield, MO 65804

Telephone: (573) 415-8379

Facsimile: (573) 415-8379

E-mail: terry@healylawoffices.com

doug@healylawoffices.com

**ATTORNEYS FOR SYMMETRY
ENERGY SOLUTIONS, LLC**

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 17th day of September, 2021.

/s/ Douglas L. Healy