# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Liberty Utilities (Midstates Natural Gas) Corp. for Authority to Issue Long Term Unsecured Debt

Case No. GF-2018-0091

### STAFF MOTION FOR EXTENSION OF TIME TO FILE RECOMMENDATION

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

1. On October 3, 2017, Liberty Utilities (Midstates Natural Gas) Corp. (hereafter "Liberty") filed an Application and Request for Waivers ("Application") which initiated this case.

2. Also on October 3, 2017, the Commission issued, by delegation of authority, an Order Directing Filing ("Order") which directed Staff to file a recommendation on the Application no later than November 2, 2017.

3. Staff has submitted two (2) data requests to Liberty regarding the Application, but responses to those data requests are not due until the same day that Staff's recommendation is currently due, *i.e.*, November 2, 2017.

4. Staff needs to receive and analyze Liberty's responses prior to preparing and filing its recommendation in this matter. At this time Staff anticipates that it will be able to prepare and file a recommendation in this matter no later than December 1, 2017, assuming that Liberty's responses are timely. Based on the information contained in Liberty's Application, Staff does not believe this short extension should cause any problem for Liberty.

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WHEREFORE, Staff moves the Commission issue an order granting Staff until

December 1, 2017, to file a recommendation on Liberty's Application in this matter.

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 26<sup>th</sup> day of October, 2017.

## /s/ Jeffrey A. Keevil