

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

In the Matter of Liberty Utilities)	<u>Case No. GT-2021-0047</u>
(Midstates Natural Gas Corp.) Proposed)	Tariff Filing No. JG-2021-0042
Tariff Sheet Filing)	Tariff Filing No. JG-2021-0050

**MOTION FOR EXTENSION OF TIME TO FILE STAFF RECOMMENDATION FOR
TARIFF FILE NO. JG-2021-0050 TO BE CONCURRENT WITH THE FILING OF THE
STAFF RECOMMENDATION FOR TARIFF FILE NO. JG-2021-0042**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Motion for Extension of Time to File Staff Recommendation for Tariff File No. JG-2021-0050 to be Concurrent with the Filing of the Staff Recommendation for Tariff File No. JG-2021-0042* (“Motion”) respectfully states as follows:

1. On August 24, 2020, the Commission issued its Order Suspending Tariff for the tariff sheet in Tracking No. JG-2021-0042 with an effective date of October 18, 2020 and ordered Staff to file its recommendation no later than *September 18, 2020*. This tariff sheet was filed to change the weather station from Kirksville to Chillicothe due to the Kirksville station no longer reporting daily temperature data. The weather station generates the raw data used by Liberty Utilities (Midstates Natural Gas Corp.) (“Liberty” or “Company”) for its Weather Normalization Adjustment Rider (“WNAR”) rate to be charged to Liberty’s customers.

2. On August 31st Liberty filed a Motion for Variance and four tariff sheets proposing new rates and an adjustment method for mimicking data from the closed station in Tariff File No. YG-2021-0050. That same day the Commission issued an order directing Staff to file a recommendation no later than *September 10th* on Liberty’s Motion for Variance and its four tariff sheets in Tariff Tracking No. YG-2021-0050.

3. Staff's Motion requests an extension to September 18th to file its recommendation regarding the rates contained in four tariff sheets (YG-2021-0050) and Liberty's Motion for Variance.

4. In support of its Motion, Staff has not received workpapers regarding the rates and adjustment method proposed and used by Liberty in Tariff File No. JG-2021-0050. Also, in preceding Tariff File No. JG-2021-0042, Staff is conducting discovery, which is still outstanding, on the matter of changing weather stations. Staff points out that the change in weather station and the rates that would flow from that station change are separate issues. Liberty proposes a method to adjust the new weather station data to mimic data and results from the Kirksville station, but has not identified or supported the method. Because both tariff files are interrelated, it is logical to address in one recommendation both the change in weather station, the proposed method for adjusting the data from the new station, and the resulting WNAR rates.

5. For Staff to prepare an informed recommendation for both tariff files, Staff needs additional time to analyze workpapers, which it does not have, and time to conduct discovery, which is still outstanding. Therefore, Staff moves the Commission to extend the time for Staff to file its recommendation on Tariff File No. JG-2021-0050 from September 10th to September 18th so that it coincides with the September 18th filing date for Staff's recommendation on Tariff File No. JG-2021-0047 and so that both recommendations may be filed together in one filing in the interest of administrative efficiency and avoiding confusion.

WHEREFORE Staff respectfully requests that the Commission grant it an extension of time from September 10, 2020 to September 18, 2020 to file its recommendation on Tariff File No. JG-2021-0050 so that Staff may have sufficient time for discovery and properly address in one recommendation the Company's proposed method to modify new weather station data used to mimic data from the closed station, because this issue becomes live only after the proposed change in weather station whose recommendation is due September 18th in Tariff File No. JG-2021-0047.

Respectfully submitted,

/s/ Robert S. Berlin

Robert S. Berlin, MOBAR#51709
Deputy Staff Counsel
Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 526-7779 (Telephone)
(573) 751-9285 (Fax)
Email: bob.berlin@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 2nd day of September 2020.

/s/ Robert S. Berlin