

**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 SECOND EXTENSION OF TIME TO FILE STAFF RECOMMENDATION
FOR TARIFF FILE NO. JG-2021-0050 AND 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 Second Extension of Time to File Staff Recommendation for Tariff File No. JG-2021-0050 And Tariff File No. JG-2021-0042* (“Motion”) respectfully states as follows:

1. On September 8, the Commission issued its *Order Granting Motion For Extension of Time* to allow Staff to file its recommendations for Tariff File Nos. JG-2021-0042 and JG-2021-0050 no later than September 18, 2020. When Staff filed its first motion for extension of time, Staff was of the belief that Liberty Utilities (Midstates Natural Gas Corp.) (“Liberty” or “Company”) would provide Staff with correct and accurate information in its workpapers and data request responses to allow Staff to prepare and file its recommendation. As of Thursday afternoon, September 17th, the Company has yet to provide Staff with its supplemental data request response containing the information that Staff needs to prepare an informed recommendation to the Commission. Because this case involves the changing of rates that customers must pay to the Company by operation of its Weather Normalization Adjustment Rider (“WNAR”), Staff must have accurate information from the Company so that it can analyze and review the WNAR calculations and prepare its ultimate recommendation.

2. So that Staff can prepare an informed recommendation, Staff respectfully requests the Commission grant it a second extension of time to September 25, 2020 to file its recommendations regarding both tariff files. Should Staff not be granted this extension, or should it not receive the supplemental data and any corresponding tariff sheets in a timely manner, Staff is unable to make its recommendation regarding Liberty's WNAR tariff filings at this time. Staff is endeavoring to file its recommendation as soon as possible given the shortfall of information from the Company and the need of the Company to make corrections to its tariff sheets and to file corrected substitute tariff sheets.

WHEREFORE, for the above-stated reasons, Staff respectfully requests that the Commission grant it a second extension of time to September 25, 2020 to file its recommendations regarding both Tariff Files Numbers and to order any other further relief as is just in the circumstance.

Respectfully submitted,

/s/ Robert S. Berlin

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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 17th day of September, 2020.

/s/ Robert S. Berlin