

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

In the Matter of the Application of Liberty)
Utilities (Midstates Natural Gas) Corp. d/b/a)
Liberty Utilities (MNG) to Change its)
Infrastructure System Replacement Surcharge)

File No. GT-2021-0073

**JOINT MOTION FOR EXTENSION OF TIME
TO FILE REPORT AND RECOMMENDATION**

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”) and Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty (“Liberty” or “Company”) for their *Joint Motion for Extension of Time to File Report and Recommendation* (“Motion”) respectfully state as follows:

1. On December 31, 2020, Liberty filed an application with the Missouri Public Service Commission pursuant to Sections 393.1009 to 393.1015, RSMo, and Commission Rules 20 CSR 4240-2.060, 2.080, and 3.265, requesting that the Commission authorize changes to the Company’s Infrastructure System Replacement Surcharges (ISRS).

2. On January 5, 2021, the Commission issued its *Order Directing Notice, Setting Intervention Deadline, Directing Filings, and Setting* (“Order”) ordering Staff to file a Recommendation no later than March 1, 2021. The Order also required Liberty to respond to Staff’s Recommendation no later than March 5, 2021.

3. In its Order, the Commission stated that Section 393.1015.2(2), RSMo, allows Staff to examine Liberty’s application and to submit a report of its examination no later than 60 days after the petition was filed. However, effective August 28, 2020, the statute changed allowing 90 days after the petition was filed for Staff to submit its report.

Also effective August 28, 2020, Section 393.1015.2(3), RSMo, allows the Commission to issue an order 180 days after the petition is filed.

4. Staff and Liberty have worked diligently to identify, process, and examine the Company's ISRS-eligible costs given the Order's timeframe. Staff and Liberty request that the Commission follow Section 393.1015.2(2), RSMo, and allow Staff to submit its recommendation no later than March 31, 2021, rather than March 1, 2021. In addition, Staff and Liberty request that the Commission allow the Company to respond to Staff's recommendation no later than April 5, 2021, rather than March 5, 2021.

WHEREFORE, to allow Staff to complete the examination of Liberty's ISRS-eligible costs, Staff and Liberty move the Commission for an order granting Staff until March 31, 2021, to file its recommendation concerning Liberty ISRS application and Liberty until April 5, 2021, to respond to Staff's recommendation.

Respectfully submitted,

/s/ Ron Irving

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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 on this 25th day of February, 2021.

/s/ Ron Irving