

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

|  |   |                                     |
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| In the Matter of Liberty Utilities     | ) | <b><u>Case No. GT-2021-0047</u></b> |
| (Midstates Natural Gas Corp.) Proposed | ) | Tariff File No. JG-2021-0042        |
| Tariff Sheet Filing                    | ) | Tariff File No. YG-2021-0050        |
|  |   | Tariff File No. YG-2021-0080        |

**STAFF RESPONSE TO ORDER DIRECTING FILING**

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Staff Response To Order Directing Filing* states as follows:

1. On September 28, the Commission issued its *Order Directing Filing* (Order) ordering “....*Staff to explain what harm, if any, would befall either the company or customers if the Commission allowed all of the tariffs to go into effect on their current effective dates...*” and to respond not later than 5:00pm the same day. Specifically, the Commission questions the requested October 1 effective date of Tariff File No. JG-2021-0042, 2<sup>nd</sup> Revised Tariff Sheet No. 67, substituted September 18 and again on September 22, bearing an October 18 effective date.

2. Staff points out that Tariff Sheet No. 67 filed in JG-2021-0042, was the first tariff filed in the docket on August 21, 2020. This tariff sheet requests to change the weather station used to calculate the WNAR for the West and Northeast rate districts from Kirksville to Chillicothe. The WNAR rate tariff sheets filed in YG-2021-0050 rely on the use of the Chillicothe weather station for the West and Northeast rate districts.

3. Tariff Sheet No. 67 not only changes the weather station from Kirksville to Chillicothe, it provides the adjustment factors for how data collected from the Chillicothe station are to be adjusted to mirror, as closely as possible, the data from the Kirksville station. These adjustment factors are used in calculating the rates that the Commission

plans to make effective on Oct. 1. If Tariff Sheet 67 would become effective after the rate tariff sheets (that rely on the Chillicothe station data per Sheet 67) then harm would occur. The approved WNAR rates would be wrongly calculated because Tariff Sheet 67 makes the necessary change in where and what weather station data is collected so that the new rates can be calculated and go into effect October 1.

4. Also, as Staff stated in its *Recommendation*, Staff also reviewed the 1st Revised Sheet No. 67.1 Cancelling Original Sheet No. 67.1 and recommends its approval, as substituted on September 22, 2020, to go into effect for service on and after October 1, 2020. Although the requested effective date is October 18, 2020, good cause exists to approve this tariff sheet on an expedited basis of October 1, 2020. Sheet No. 67.1 is a companion tariff sheet to Sheet No. 67. Sheet 67.1 is only being revised for housekeeping purposes to continue the existing tariff language that had been on Sheet 67 so that the language on that page is not cut off but instead runs onto the next page, Sheet 67.1.

**WHEREFORE**, Staff prays the Commission accept its Response and issue an order approving the WNAR tariff sheets filed by Liberty, and recommended by Staff, as substituted and to go into effect as requested for service on October 1, 2020.

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 28<sup>th</sup> day of September 2020.

**/s/ Robert S. Berlin**