

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

In the Matter of Liberty Utilities Verified)	
Application for Approval of PVC Pipe)	File No. GO-2019-0091
Replacement Program and Recovery of Associated)	
Costs Through ISRS Mechanism)	

LIBERTY UTILITIES' PROCEDURAL RECOMMENDATION

COMES NOW Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Utilities ("Liberty Utilities" or "Company") and submits this Procedural Recommendation. In support thereof, Liberty Utilities states as follows:

1. On January 9, 2019, the Staff of the Missouri Public Service Commission ("Staff") filed its Recommendation ("Staff's Recommendation") in response to the Verified Application filed by Liberty Utilities on September 28, 2018. In that Application, the Company requested that the Commission approve a ten year replacement program for the PVC pipe remaining in its system. The Company also requested that the Commission determine that the costs associated with such replacements would be eligible for recovery under the Company's Infrastructure System Replacement Surcharge ("ISRS") mechanism.

2. Since the Staff made its filing, the Company and Staff have had an opportunity to discuss various aspects of Staff's Recommendation. They have also exchanged additional information relating to the matters addressed by the Company's Application. The Company believes it would be useful to conduct additional discussions with the Staff before it files its Response to Staff's Recommendation outlining its position in light of that Recommendation.

3. To that end, Liberty Utilities requests that the Commission issue an Order directing the Company to submit its Response to the Staff's Recommendation no later than February 28, 2019, including any recommendations the Company may have regarding how it believes the Commission should proceed in this matter. The Company contemplates, of course, that other parties would have a full opportunity to respond to any matters addressed in the Company's response.

4. Liberty Utilities has been advised by counsel for the Staff that Staff has no objection to the relief requested herein.

WHEREFORE, for the foregoing reasons, Liberty Utilities respectfully requests that the Commission issue its Order instructing the Company to respond to Staff's Recommendation no later than February 28, 2019 consistent with the request set forth herein. .

Respectfully submitted,

LIBERTY UTILITIES

/s/James M. Fischer

James M. Fischer MBN 27543

Fischer & Dority, P.C.

101 Madison--Suite 400

Jefferson City, Missouri 65101

573-636-6758 ext. 1

jfischerpc@aol.com

/s/ Michael C. Pendergast

Michael C. Pendergast, MBN 31763

Of Counsel

Fischer & Dority, P.C.

Telephone: (314) 288-8723

Email: mcp2015law@icloud.com

Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing pleading was served on the General Counsel of the Staff of the Missouri Public Service Commission and the Office of the Public Counsel on this 22nd day of January 2019 by hand-delivery, e-mail, fax, or by placing a copy of such document, postage prepaid, in the United States mail.

/s/James M. Fischer