

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

In the Matter of Liberty Utilities (Midstates	)	<b><u>Case No. GR-2019-0123</u></b>
Natural Gas) Corp. d/b/a Liberty Utilities'	)	Tariff No. YG-2019-0074
Purchased Gas Adjustment Tariff Filing	)	

**STAFF RECOMMENDATION REGARDING LIBERTY UTILITIES'  
2017-2018 ACTUAL COST ADJUSTMENT FILING**

**COMES NOW** Staff of the Missouri Public Service Commission, by and through counsel, and files its Actual Cost Adjustment (ACA) Recommendation in this matter.

1. Liberty filed for its 2017-2018 ACA on November 2, 2018. This filing contains one proposed tariff sheet and Liberty's ACA account balance calculations.

2. On November 28, 2018 the Commission approved the proposed tariff sheet on an interim, subject to refund basis and ordered Staff to file a recommendation regarding its ACA review by December 17, 2019.

3. The Procurement Analysis Department (Staff) reviewed Liberty's filing and submits its recommendation in the accompanying Staff Recommendation Memorandum, marked Appendix A and incorporated herein by reference. Staff's analysis consisted of examining the prudence of Liberty's gas purchasing decisions for this ACA period, conducting a reliability analysis, and reviewing Liberty's hedging practices. Staff also compared Liberty's billed revenues and its actual gas costs to determine whether there is an over-recovery or under-recovery of the ACA balances.

4. Staff has no proposed adjustments to the ending ACA balances in Liberty's filing. Staff recommends the Commission issue an order establishing Liberty's ending ACA balances as those in the "Staff Proposed Balances 8/31/2018" column of the table in the Memorandum's Recommendations section.

5. Staff lists other recommendations in the Recommendations section. Staff recommends the Commission order Liberty to respond to these recommendations within forty-five (45) days.

**WHEREFORE**, Staff recommends the Commission issue an order establishing Liberty's ending ACA account balances as of August 31, 2018 as shown in the "Staff Proposed Balances 8/31/18" column of the table in the Staff Memorandum Recommendations section and directing Liberty to respond within 45 days to Staff's other recommendations discussed in its Memorandum.

Respectfully submitted,

**/s/ Karen E. Bretz**

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been emailed to all parties and/or counsel of record on this 10<sup>th</sup> day of December, 2019.

**/s/ Karen E. Bretz**