BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Liberty Utilities (Missouri Water) LLC for Authority to Issue Long Term Unsecured Debt.

File No. WF-2021-0016

<u>LIBERTY UTILITIES (MISSOURI WATER) LLC'S RESPONSE TO</u> STAFF'S RECOMMENDATION AND PUBLIC COUNSEL'S RESPONSE

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COMES NOW Liberty Utilities ("Missouri Water") LLC (hereinafter "Liberty Water"), by and through its undersigned counsel, and for its Response to Staff's Recommendation and Public Counsel's Response to Staff's Recommendation states to the Missouri Public Service Commission ("Commission") as follows:

1. On January 15, 2021 Liberty Water filed its Application pursuant to Section 393.200 RSMo and Commission Rules 20 CSR 4240-2.060, 20 CSR 4240-2.080 and, 20 CSR 4240-10.125 for authority to issue long-term unsecured debt.

2. On March 5, 2021, Liberty Water filed its Amendment to Application for Authority to Issue Long-Term Unsecured Debt.

3. On March 15, 2021, Staff filed its Recommendation which, among other things, recommended that the Application, as amended, be approved, subject to four (4) conditions as set forth in Staff's Memorandum, which was attached to Staff's Recommendation.

4. On March 17, 2021, the Public Counsel filed its Response to Staff's Recommendation in which it proposed a revision to Staff's first condition and recommended two(2) additional conditions.

5. Liberty Water has no objection to Staff's Recommendation and the four (4) conditions contained therein. In addition, Liberty Water has no objection to Public Counsel's proposed revision to Staff's first condition, as well as its additional two (2) conditions.

WHEREFORE, in light of the foregoing Applicant requests that the Commission issue an Order approving its Application to Issue Long-Term Unsecured Debt, incorporating the four (4) conditions recommended by Staff (with Staff's first condition revised as recommended by Public Counsel) and incorporating Public Counsel's additional two (2) conditions, and for such other orders as are appropriate in the circumstances.

Respectfully submitted,

/s/ W.R. England, III W. R. England, III Mo. Bar #23975 Dean Cooper Mo. Bar #36592 BRYDON, SWEARENGEN & ENGLAND, P.C. 312 East Capitol Avenue P. O. Box 456 Jefferson City, Missouri 65102-0456 Telephone: (573) 635-7166 Facsimile: (573) 634-7431 Email: trip@brydonlaw.com Email: dcooper@brydonlaw.com <u>/s/ Diana C. Carter</u> Diana C. Carter LIBERTY UTILITIES 428 E. Capitol Ave., Suite 303 Jefferson City, Missouri 65101 Joplin Office Phone: (417) 626-5976 Cell Phone: (573) 289-1961 Email: Diana.Carter@LibertyUtilities.com

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was delivered by first class mail, electronic mail or hand delivery, on this 24th day of March, 2021, to the following parties:

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/s/ W.R. England, III