

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

In the Matter of Liberty Utilities (Midstates )  
Natural Gas) Corp. d/b/a Liberty Utilities' )  
Tariff Revisions Designed to Implement a ) **File No. GR-2018-0013**  
General Rate Increase for Natural Gas )  
Service in the Missouri Service Areas of the )  
Company )

**STAFF’S MOTION TO CANCEL DISCOVERY CONFERENCE**

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Motion to Cancel Discovery Conference* hereby respectfully states:

1. On January 5, 2018, Staff filed its *Motion to Compel Discovery From Liberty and Motion for Discovery Conference Regarding the Same*.

2. Since Staff’s filing, Staff has been in contact with *Liberty* Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Utilities (“Liberty”), and based on Liberty’s representations, Staff is willing to forego the January 9 discovery conference in order to give the Company the opportunity to provide additional information to Staff. In the event Staff does not receive adequate information, Staff intends to request another discovery conference on an expedited basis to resolve the remaining issues as outlined in Staff’s January 5 filing.

3. Based on discussions with Liberty, Staff expects to receive responsive information to DRs 0136 – 0180, notwithstanding Liberty’s objections, by January 15, 2018. Staff is not clear on every piece of information it should expect to be provided, but some of the information was specifically addressed during Staff’s conversations with Liberty:

a) 0138 – Based on discussions with Liberty, Staff understands that Liberty intends to provide whatever budget variance reports for APUC are available.

b) 0154 – Based on discussions with Liberty, Staff understands that Liberty intends to provide whatever budget variance reports for LUC are available.

c) 0172 – Based on discussions with Liberty, Staff understands that Liberty intends to provide whatever budget variance reports for LUSC are available.

4. Staff requests that the discovery conference scheduled for January 9, 2018 be cancelled to allow Liberty to provide additional information to Staff. Staff also hereby notifies the parties that Staff intends to request another discovery conference on an expedited basis in the event that Staff does not receive adequate information by January 15, 2018, in accordance with the terms of the procedural schedule, paragraph 3.

**WHEREFORE**, Staff requests the Commission issue an order canceling the January 9, 2018, discovery conference, and granting such other and further relief as is appropriate under the circumstances.

Respectfully submitted,

**/s/ Marcella L Forck**

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**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing were mailed, electronically mailed, or hand-delivered to all counsel of record this 8th day of January, 2018.

**/s/ Marcella L. Forck**