BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Liberty Utilities (Midstates Natural) Gas) Corp. d/b/a Liberty (MNG) Purchased Gas Adjustment Tariff Filing

Case No. GR-2021-0101 Tariff No. YG-2021-0116

MOTION FOR EXTENSION OF TIME TO FILE STAFF RECOMMENDATION

COMES NOW Staff of the Missouri Public Service Commission, by and through

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counsel, and for its Motion for Extension of Time to File Staff Recommendation

(Motion) states:

1. On Friday afternoon, November 13, 2020, Liberty (MNG) filed a substitute

tariff sheet to correct significant errors in its original tariff sheet filing. Liberty's tariff filing

letter to the Commission states:

The substitute tariff sheet filing was created to correct calculation errors in the workpapers of Liberty's consultant. This was first discovered by Staff in review of the Liberty West Area (WEMO) rates. In each of the PGA service areas, injections of gas into storage was entered in the filing workpapers with the incorrect sign. Due to the magnitude of the withdrawal volumes, the correction has changed the ACA/PGA rates for each area. Also, during the process a few minor reconciliation items were identified and resolved.

2. To allow Staff sufficient time to review the new calculations, Liberty extended the tariff sheet effective date from December 6th to December 13th.

3. Liberty counsel also informed undersigned Staff counsel that the Company

would support an extension of time from November 16th to November 20th for Staff to

review the calculations contained in the substitute tariff sheet filing and to file its recommendation.

4. Staff moves the Commission grant it an extension of time to November 20th

to file its recommendation regarding the PGA rate calculations contained in the substitute

tariff sheet filing. Staff will make every effort to file its recommendation in this matter earlier if possible.

WHEREFORE, Staff respectfully requests the Commission grant it an extension

of time to file its PGA/ACA recommendation from November 16th to November 20th.

Respectfully submitted,

/s/ Robert S. Berlin

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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 16th day of November, 2020.

/s/ Robert S. Berlin