BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Symmetry Energy Solutions, LLC,)
Complainant,))
V.)
The Empire District Gas Company d/b/a Liberty,)))
Respondent.)

Case No. GC-2022-0062

JOINT MOTION FOR ADOPTION OF PROCEDURAL SCHEDULE

Complainant Symmetry Energy Solutions, LLC ("Symmetry") and Respondent The Empire District Gas Company d/b/a Liberty ("Liberty") hereby file this Joint Motion for Adoption of Procedural Schedule. In support of this Motion, the parties state as follows:

1. On November 17, the Missouri Public Service Commission ("Commission") issued an *Order Directing the Parties to File a Procedural Schedule* directing that the parties file a jointly proposed scheduling order by December 1, 2021.

2. In accordance with the Commission's Order, the parties propose the following procedural schedule.

Direct Testimony of Complainant	April 1, 2022
Rebuttal Testimony of Respondent	May 13, 2022
Cross-Rebuttal Testimony (Staff and Intervenors)	June 14, 2022
Surrebuttal Testimony (All Parties)	July 5, 2022
Joint List of Issues, order of witnesses, order of parties for cross-examination,	
order of opening statements	July 7, 2022
Deadline for Serving Discovery	July 7, 2022

Statements of Position	July 13, 2022
Evidentiary Hearing	July 18-21, 2022
Initial Briefs	August 3, 2022
Reply Briefs	August 10, 2022

3. The parties also request that the Commission (a) on and after April 1, 2022, shorten the response time for all data requests to 10 calendar days and to 5 calendar days to object or notify that more than 10 calendar days will be needed to provide the requested information and (b) on and after May 13, 2022, further shorten the response time for all data requests to 5 calendar days and to 3 calendar days to object or notify that more than 5 calendar days will be needed to provide the requested and the requested information.

4. Undersigned counsel represents that all parties consent to this proposed procedural schedule.

Respectfully Submitted,

HEALY LAW OFFICES, LLC

By: <u>/s/ Douglas L. Healy</u> Douglas L. Healy, #51630 Peggy A. Whipple, #54758 Terry M. Jarrett, #45663 3010 E. Battlefield, Suite A Springfield, MO 65804 doug@healylawoffices.com peggy@healylawoffices.com terry@healylawoffices.com Telephone: (417) 864-7018

/s/ Nathan M. Saper

Nathan M. Saper Steven M. Bauer Katherine A. Sawyer Margaret A. Tough Latham & Watkins LLP 505 Montgomery Street, Suite 2000 San Francisco California 94111-6538 (415) 391-0600 nathan.saper@lw.com steven.bauer@lw.com katherine.sawyer@lw.com margaret.tough@lw.com

Attorneys for Complainant Symmetry Energy Solutions, LLC

OFFICE OF THE PUBLIC COUNSEL

By: /s/ Marc D. Poston Marc D. Poston (#45722) Public Counsel P. O. Box 2230 Jefferson City MO 65102 (573) 751-5318 (573) 751-5562 FAX marc.poston@opc.mo.gov

MISSOURI PUBLIC SERVICE COMMISSION

s/ Karen E. Bretz Karen E. Bretz Senior Counsel Missouri Bar No. 70632 Attorney for the Staff of the Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102 573-751-5472 (Voice) 573-751-9285 (Fax) Karen.Bretz@psc.mo.gov

/s/ Elizabeth W. Whittle

Elizabeth W. Whittle (*Admitted Pro Hac Vice*) Benjamin N. Reiter (*Admitted Pro Hac Vice*) NIXON PEABODY LLP 799 9th Street, N.W., Suite 500 Washington, D.C. 20001 (202) 585-8338 ewhittle@nixonpeabody.com (202) 585-8721 breiter@nixonpeabody.com

/s/Christopher M. Mason

Christopher M. Mason (*Admitted Pro Hac Vice*) NIXON PEABODY LLP 55 West 46th Street, Tower 46 New York, New York 10036 (212) 940-3017 cmason@nixonpeabody.com

/s/Sarah Knowlton

Sarah Knowlton (MBE# 71361) General Counsel, Liberty Utilities 116 North Main Street Concord, NH 03301 (603) 724-2123 Sarah.knowlton@libertyutilities.com

/s/ Diana Carter

Diana Carter (MBE#50527) Director, Legal Services 602 S. Joplin Avenue Joplin, MO 64802 (417) 626-5976 Diana.Carter@libertyutilities.com

Counsel to The Empire District Gas Company

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served upon all of the parties of record or their counsel, pursuant to the Service List maintained by the Data Center of the Missouri Public Service Commission, on this day of December 1, 2021.

<u>/s/ Douglas L. Healy</u> Douglas L. Healy