

**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 FOR DISCOVERY CONFERENCE**

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

1. Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Utilities ("Liberty") filed revised tariffs indicating a request for a rate increase on September 29, 2017, causing the Commission to open Case No. GR-2018-0013. Staff began a full investigation of the company related to its request. On November 30, 2017, the Commission issued its *Order Adopting Recommended Procedural Schedule* in this matter, which contained several provisions regarding the conduct of discovery.

2. The procedural schedule provides for monthly discovery conferences in which written discovery motions may be taken up, and waives the requirement of Commission Rule 4 CSR 240-2.090 that a party must seek a telephone conference with the presiding officer before filing a discovery motion. The next scheduled discovery conference is scheduled for February 6, 2018.

3. Staff has a number of outstanding data requests to the Company that are delinquent as of the date of this filing. Although Staff has been working with the Company to obtain the required information, production of information continues to be

slow and unsatisfactory. Staff is unable to complete its review without the information requested in the unanswered DRs.

4. Staff believes a discovery conference is necessary to compel adequate responses to Staff's DRs.

5. Staff has discussed the discovery conference with the Company, and the Company has requested that the discovery conference be held in the afternoon of February 6, rather than beginning at 10:00 am, as put forth in the ordered procedural schedule. Staff is amenable to an afternoon start time and would recommend that the discovery conference begin no later than 2:00 pm on February 6, 2018.

6. The purpose of this rate case is to determine just and reasonable rates to be paid by Liberty customers for safe and adequate utility service. Staff has an obligation to reasonably ensure that the rates will cover the costs of services for Liberty but also to reasonably ensure that the ratepayers are not providing more than the cost of service.

7. Staff requests that its discovery concerns be addressed in the next scheduled discovery conference, February 6, 2018, beginning in the afternoon no later than 2:00 pm.

**WHEREFORE**, Staff requests the Commission issue an order setting these matters to be discussed at the discovery conference presently scheduled for February 6, beginning in the afternoon no later than 2:00 pm; and grant 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 2nd day of February, 2018.

**/s/ Marcella L. Forck**