

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

In the Matter of the Request of the Empire                    )  
District Gas Company d/b/a Liberty for                    )     **File No. GR-2021-0320**  
Authority to File Tariffs Increasing Rates                )  
For Gas Service Provided to Customers                    )  
In its Missouri Service Area.                                )

**MOTION TO SUSPEND THE FILING OF SURREBUTTAL TESTIMONY ON REVENUE  
REQUIREMENT AND RATE DESIGN ISSUES**

**COMES NOW**, The Empire District Gas Company d/b/a Liberty or Liberty Utilities (“EDG”), on behalf of itself, Commission Staff, Office of the Public Counsel, Midwest Energy Consumers Group (“MECG”) and the Missouri School Board Association (“MSBA”), and hereby requests the Commission to suspend the procedural schedule as it relates to all revenue requirement and rate design issues in this case, with the exception of the issues raised by MSBA herein. In support of this motion, EDG states:

1. After the filing of testimony and holding local public hearings, the Signatories began negotiations to determine whether a resolution of issues could be mutually reached in advance of the evidentiary hearings. As a result of these discussions, the Signatories have agreed in principle to a settlement of all issues, except for the issues raised by MSBA.

2. In order to facilitate the preparation of a Stipulation and Agreement on all issues, except for the issues raised by MSBA, the parties request that the Commission suspend the requirement to file surrebuttal testimony which is currently due on Monday, April 11, 2022. Surrebuttal testimony would continue to be filed on April 11, 2022 on issues raised by MSBA. The remainder of the procedural schedule would remain in place for the resolution of the MSBA issues.

**WHEREFORE**, EDG, on behalf of itself, and the Commission Staff, Office of the Public Counsel, Midwest Energy Consumers Group (“MECG”) and the Missouri School Board Association (“MSBA”), respectfully requests that the Commission suspend the procedural schedule as it relates to the filing of surrebuttal testimony for all revenue requirement and rate design issues in this case, with the exception of the issues raised by MSBA herein.

Respectfully submitted,

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**ATTORNEYS FOR THE EMPIRE DISTRICT GAS  
COMPANY D/B/A LIBERTY OR LIBERTY  
UTILITIES**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 8<sup>th</sup> day of April, 2022, to all counsel of record.

/s/ James M. Fischer  
James M. Fischer