# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Verified Application and	)	
Petition of Liberty Energy (Midstates) Corp.	)	File No. GO-2014-0006
d/b/a Liberty Utilities to Change its Infrastructure	)	
System Replacement Surcharge.	)	

## JOINT RESPONSE TO ORDER DIRECTING FILING

COMES NOW Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Utilities ("Liberty Utilities" or "Company"), the Staff of the Missouri Public Service Commission ("Commission") ("Staff"), and the Office of the Public Counsel ("OPC") (collectively "the Parties") and for their Joint Response To Order Directing Filing, respectfully state as follows:

- 1. In its *Order Directing Filing* issued on September 3, 2015 in this matter, the Commission acknowledged that all parties now agree the amount to be refunded to ratepayers is \$128,832, divided among Liberty Utilities' three districts, and that said refunds should be made in a one-time ISRS bill credit to each customer. The Commission further noted that questions remain about the timing of the issuance of those bill credits, and granted Liberty Utilities' request that the parties be allowed until September 10 to provide the Commission with a status update or final proposal regarding the issuance of the bill credits. Accordingly, the Parties respectfully provide their joint proposal as set out below.
- 2. The Parties agree that the bill credits can be timely and efficiently made in conjunction with the initial billing of new ISRS rates resulting from pending File No. GO-2015-0350. The initial notice sent to customers regarding the ISRS rates established in File No. GO-2015-0350, also will reference the one-time bill credits. Finally, the one-time credits will be reflected as a separate line-item on the customer bills.

WHEREFORE, Liberty Utilities, Staff and OPC respectfully request that the Commission accept this Joint Response and adopt their proposal regarding the issuance of bill credits as set forth herein and in the appendices to the "Staff Response to Liberty Utilities' Filing" submitted on August 28, 2015.

#### Respectfully submitted,

## /s/ Larry W. Dority

ifischerpc@aol.com

lwdority@sprintmail.com

James M. Fischer, MBN 27543 Larry W. Dority, MBN 25617 FISCHER & DORITY, P.C. 101 Madison Street, Suite 400 Jefferson City, MO 65101 Telephone: (573) 636-6758 Facsimile: (573) 636-0383

D/B/A LIBERTY UTILITIES

ATTORNEYS FOR LIBERTY UTILITIES (MIDSTATES NATURAL GAS) CORP.

#### /s/ Marc D. Poston

Marc D. Poston, MBN 45722 Chief Deputy Counsel Office of the Public Counsel 200 Madison Street, Suite 600 P.O. Box 2230 Jefferson City, MO 65102 573/751-5558 573/751-5562 (fax) marc.poston@ded.mo.gov

ATTORNEY FOR OFFICE OF THE PUBLIC COUNSEL

#### /s/ Jeffrey A. Keevil

Jeffrey A. Keevil, MBN 33825
Deputy Counsel
Staff Counsel's Office
Missouri Public Service Commission
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102
573/526-4887
573/751-9285 (fax)
Jeff.Keevil@psc.mo.gov

ATTORNEY FOR STAFF

# **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this  $9^{th}$  day of September, 2015.

/s/ Larry W. Dority

Larry W. Dority