



March 1, 2023

VIA ELECTRONIC FILING

Ms. Nancy Dippell, Secretary
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

**RE: Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty
Weather Normalization Adjustment Rider (“WNAR”)**

Dear Judge Dippell:

I am providing herewith to the Missouri Public Service Commission for filing, in electronic form, the following revised tariff sheets:

Form 13 - P.S.C. MO. No. 2, 10th Revised Sheet No. 67.2;
Form 13 - P.S.C. MO. No. 2, 10th Revised Sheet No. 67.3;
Form 13 - P.S.C. MO. No. 2, 10th Revised Sheet No. 67.4; and
Form 13 - P.S.C. MO. No. 2, 10th Revised Sheet No. 67.5.

These revised tariff sheets, which have an issue date of March 1, 2023, and an effective date of April 1, 2023, are designed to reflect the semi-annual adjustment made pursuant to the Company’s WNAR for the six-month period ending September 30, 2023. The rates are calculated semiannually to adjust for actual heating degree days as they differ from the normal levels and are effective for twelve months.

The Company’s WNAR tariff states that the Company shall determine the Semiannual Reconciliation Rate (“SRR”) based on the over- or under-billing during the twelve-month billing of each Current Semiannual WNA (“CSWNA”) and SRR using the effective CSWNA and SRR rates and nine months actual sales and three months projected sales. This filing includes the Company’s CSWNA reconciliation for the twelve-month period ending March 31, 2024. This CSWNA reconciliation establishes the SRR rates to be effective April 1, 2023.

Additionally, while preparing the second semi-annual (S2) 2022 WNAR filing, Liberty identified an error in the first semi-annual (S1) 2022 WNAR filing related to HDDs for December 2021. This error overstated the normal heating degree days and overstated the revenue the Company should have received related to normalization of weather. Liberty also identified an input error from the April 2021 reconciliation amount. Liberty discussed these errors with the Staff of the Commission. At the time, it was determined that the next S1 filing (this filing) would be the appropriate place to correct the errors, instead of the S2 filing pending at that time. The combined impact of the errors was \$1,080,472. Due to the cap on recovery in the mechanism, \$119,861 was deferred and not built into the rates for the April 2022 S1 period.



The \$119,861 has been netted against the \$1,080,472 for a net prior period adjustment of \$960,611 for this current filing. Liberty has included this amount as a PPA credit to customers on the tab 'SRR Summary' in the workpapers being provided to Staff and OPC. Details of these prior period adjustments by territory and rate class are found in the 'PriorPerAdj' worksheet. Derivation of the HDD adjustments are in the 'CSWNA Diff' worksheet. Explanation of how the HDD discrepancy occurred is in the 'HDD Discrepancy Explanation' worksheet, and the explanation of the inaccurate carryover of the reconciling period adjustment amount is the 'ReconPerAdjExplanation' worksheet.

Compared to currently existing rates, and assuming normal usage, the WNAR adjustment will decrease the average monthly bill of the typical residential customer by approximately:

\$5.21 per month, or 4.58% in the Company's Northeast District;
\$5.21 per month, or 4.57% in the Company's West District; and
\$4.31 per month, or 5.12% in the Company's Southeast District.

Such bill impacts may be less or more depending on a customer's actual usage, which is largely affected by weather.

Please bring this WNAR filing to the attention of the Commissioners and the appropriate Commission personnel, and please do not hesitate to contact me with any questions or concerns.

Sincerely,

Diana Carter