

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

In the Matter of Liberty Utilities (Midstates)
Natural Gas) Corp.’s) Case No. GR-2021-0101
Purchased Gas Adjustment Tariff Filing)

LIBERTY’S MOTION FOR TARIFF VARIANCE

COMES NOW Liberty Utilities (Midstates Natural Gas) Corp. (“Liberty”) and, for its Motion for Tariff Variance, respectfully states as follows to the Missouri Public Service Commission (“Commission”):

1. This docket was opened on October 6, 2020, for the Winter Purchased Gas Adjustment (“PGA”) filing for Liberty’s four PGA service areas to reflect changes in the PGA factors and the Actual Cost Adjustment (“ACA”) factors.

2. The Commission has approved PGA clauses as the most efficient mechanism for LDCs to manage fluctuations in the cost of gas that result from changes in rates charged by wholesale suppliers. *State ex rel. Midwest Gas Users’ Association*, 976 S.W.2d 470, 474-75 (Mo.App.W.D. 1998). The Commission’s approval of PGA mechanisms is grounded in the Commission’s broad regulatory authority over gas corporations, and each natural gas LDC in Missouri has its own PGA clause, which is approved during a general rate case and codified in each utility’s tariffs.

3. Liberty’s PSC MO No. 2, Sheet No. 41 provides “(t)he Winter PGA shall be filed between October 15 and November 4 of each calendar year.” Liberty’s filing, however, was inadvertently not submitted by November 4, 2020, and, instead, is being filed on this date. As such, Liberty requests a variance from the referenced tariff provision. The two-day delay in Liberty’s filing results in no harm to customers. The revised tariff sheet is being filed with a full thirty days’ notice, the PGA rates are increasing in total, and actual receipts will be trued-up.

4. Being submitted, in electronic form, is the 27th Revised Sheet No. 44 for all areas of Missouri, which replaces the 26th Revised Sheet No. 44. The tariff sheet represents Liberty's Winter PGA filing for its four PGA service areas and reflects changes in the PGA and ACA factors. This revised tariff sheet bears an issue date of November 6, 2020, and a proposed effective date thirty days after submission (December 6, 2020).

5. As a result of this filing, for the Liberty West Area (WEMO), the effect of these changes will increase the firm PGA rate from the current \$0.33671 per Ccf (100 cubic feet) to \$0.55465 per Ccf. For the Kirksville area, the effect of these changes will decrease the firm PGA rate from the current \$0.31639 per Ccf to \$0.30675 per Ccf. For the Northeast Area (NEMO), the effect of these changes will decrease the firm PGA rate from the current \$0.36512 per Ccf to \$0.31659 per Ccf. For the Southeast Area (SEMO), the effect of these changes will increase the firm PGA rate from the current \$0.35250 per Ccf to \$0.40808 per Ccf.

WHEREFORE, Liberty requests a variance from the requirement of its tariff that its winter PGA/ACA filing be submitted by November 4, 2020. Liberty requests such other and further relief as is just and proper under the circumstances.

Respectfully submitted,

/s/ Diana C. Carter

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CERTIFICATE OF SERVICE

I hereby certify that the above document was filed in EFIS on this 6th day of November, 2020, with notice of the same sent to all counsel of record.

/s/ Diana C. Carter