

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

In the Matter of Liberty Utilities Verified	)	
Application for Approval of PVC Pipe	)	File No. GO-2019-0091
Replacement Program and Recovery of Associated	)	
Costs Through ISRS Mechanism	)	

**LIBERTY UTILITIES' NOTICE OF VOLUNTARY DISMISSAL**

**COMES NOW** Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Utilities ("Liberty Utilities" or "Company") and, pursuant to Section 4 CSR 240-2.116 of the Commission's Rules, submits its Notice of Voluntary Dismissal of the Application filed in the above captioned case on September 30, 2018. In support thereof, Liberty Utilities states as follows:

On September 30, 2018, Liberty Utilities filed an Application seeking Commission approval of a replacement plan for the PVC pipe that remains in the Company's distribution system. Since the filing of the Application, Staff and the OPC have filed recommendations and pleadings in which they have raised questions about the need to seek pre-approval of the Company's plan to replace PVC pipe from its system prior to a future request by the Company to seek recovery of such replacement costs in its ISRS mechanism. In light of Staff and OPC's positions, and the Company's recent understanding that the Commission previously determined that all of the expenditures made by Ameren Missouri to completely eliminate PVC pipe from its distribution system were properly included in and recovered through that utility's ISRS mechanism, *see e.g.*

**Re: Union Electric Company d/b/a Ameren Missouri**, File No. GO-2014-0015; Tariff No. YG-2014-0022,<sup>1</sup> the Company is voluntarily dismissing this action.

**WHEREFORE**, the Company respectfully requests that the Commission take notice of this voluntary dismissal and cancel the April 3, 2019 procedural conference currently scheduled in this case.

Respectfully submitted,

LIBERTY UTILITIES (MIDSTATES NATURAL  
GAS) CORP.

**/s/James M. Fischer**

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<sup>1</sup>In Case No. GO-2014-0015, the Commission approved expenditures made by Ameren Missouri to replace PVC in various parts of its Missouri distribution system, including PVC main replacement and/or service replacements in Cairo, Hawk Point, Old Monroe, New London, Foley, High Hill, Rocheport, Truxton, Farber, Renick, Wellsville, and Wentzville, Missouri. (See Attachment A, Schedule 1, pp. 3-6, and Schedule 2, pp. 3-5 to the Verified Petition of Union Electric Company d/b/a Ameren Missouri to Change its Infrastructure System Replacement Surcharge, filed on July 16, 2013 and approved on by Order dated October 3, 2013)

**Certificate of Service**

The undersigned certifies that a true and correct copy of the foregoing Notice of Voluntary Dismissal of Liberty Utilities Inc. was served on the General Counsel of the Staff of the Missouri Public Service Commission and the Office of the Public Counsel on this 21st day of March 2019 by hand-delivery, e-mail, fax, or by placing a copy of such document, postage prepaid, in the United States mail.

**/s/James M. Fischer**

James M. Fischer