

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

In the Matter of the Application of the Empire)
District Gas Company for a Name Change to) Case No. GN-2021-0039
The Empire District Gas Company d/b/a Liberty)

In the Matter of the Application of Liberty Utilities)
(Midstates Natural Gas) Corp. for a Name) Case No. GN-2021-0041
Change to Liberty Utilities (Midstates Natural)
Gas) Corp. d/b/a Liberty)

In the Matter of the Application of Liberty)
Utilities (Missouri Water) LLC for a Name) Case Nos. WN-2021-0042
Change to Liberty Utilities (Missouri Water) LLC) and SN-2021-0043
d/b/a Liberty)

RESPONSE TO COMMISSION ORDER

COME NOW The Empire District Electric Company (“EDE”), The Empire District Gas Company (“EDG”), Liberty Utilities (Missouri Water) LLC (“Liberty Water”), and Liberty Utilities (Midstates Natural Gas) Corp. (“Midstates”) (collectively, the “Missouri Utilities”) and for their Response to Commission Order with regard to the *Order Directing Response* issued October 1, 2020, respectfully state as follows to the Missouri Public Service Commission (“Commission”):

1. The four Missouri Utilities are subsidiaries of Liberty Utilities Co., a Delaware corporation that owns regulated utilities in the United States and is an indirect subsidiary of Algonquin Power & Utilities Corp. The four Missouri Utilities are part of the Liberty Central Region, which encompasses a number of other entities, including Liberty Utilities (Pine Bluff Water) Inc., Liberty Utilities (Missouri Water) LLC, Liberty Utilities (Arkansas Water) Corp., and Liberty Utilities (Midstates Natural Gas) Corp.
2. On August 15, 2020, a Notice of Fictitious Name Registrations was submitted on behalf of the Missouri Utilities in Case No. AO-2020-0184. To the extent required, the Missouri Utilities requested approval of the use of a fictitious name pursuant to Commission Rule 20

CSR 4240-2.060(5). Thereafter, the Commission opened a “name change” docket for each of the Missouri Utilities.

3. All active tariff sheets adding the fictitious name “Liberty” were submitted and approved by the Commission as part of the compliance tariff process for EDE in Case No. ER-2019-0374. EDE’s and EDG’s tariff sheets did not previously include the “Liberty Utilities” or “Liberty Utilities – Empire District” fictitious names.
4. For Liberty Water and Midstates, adoption notices and revised title pages, adding “or Liberty” after “d.b.a Liberty Utilities,” were submitted. An adoption notice and revised title page with the fictitious names were also submitted for EDG.
5. The individual entity names, The Empire District Electric Company, The Empire District Gas Company, Liberty Utilities (Missouri Water) LLC, and Liberty Utilities (Midstates Natural Gas) Corp., remain unchanged, but “Liberty” will be an additional common operating name for the Missouri Utilities’ operations in Missouri.
6. Since the entity names remain unchanged, those names will continue to be used in regulatory filings, on contracts, and in other legal documents and may be used in some correspondence and other communications.
7. As noted in the Notice filed in Case No. AO-2020-0184 on August 15, 2020, fictitious name registrations for “Liberty” were filed with and accepted by the Missouri Secretary of State’s Office for each of the four Missouri Utilities. The fictitious name of “Liberty Utilities” remains active with the Missouri Secretary of State’s Office for the four Missouri Utilities as well. In certain other states, however, the Secretary of State does not permit the same registered fictitious name for multiple legal entities. Liberty Utilities (America) Co. has pending trademark applications for the LIBERTY operating name and

related design marks at the U.S. Patent and Trademark Office, for which the USPTO has issued Notices of Allowance.

8. Liberty intends to file Commission Annual Reports for each of the Missouri Utilities for their electric, gas, water, and wastewater operations utilizing their legal entity names, with the fictitious names of “Liberty Utilities” and/or “Liberty” included as additional operating names.
9. Attached hereto is a sample of the bill insert that will be sent to all customers during the November billing cycle. As noted therein, the transition to the new Liberty logo will happen over time.
10. Paper products such as envelopes, billing statements, and handbooks will be transitioned from “Liberty Utilities” to “Liberty” as stock is depleted. Other items, such as signage on vehicles, will include the “Liberty” operating name and logo instead of the prior “Liberty Utilities” operating name and logo as those items are due for replacement. As such, there will be a period of time where both “Liberty Utilities” and “Liberty” will be used.

WHEREFORE, the Missouri Utilities respectfully submit this Response to Commission Order and request such relief as is just and proper under the circumstances.

/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 October, 2020, with notification of the same sent to all counsel of record.

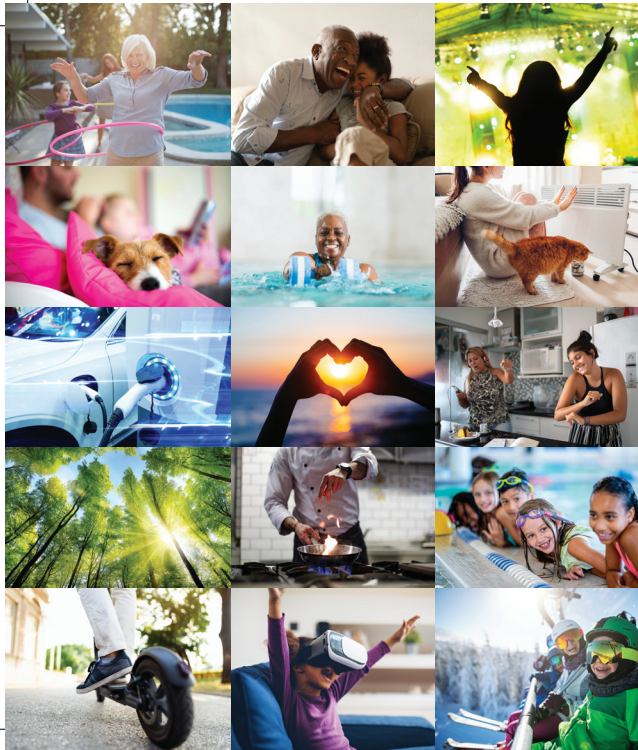
/s/ Diana C. Carter



We're putting our heart where it matters

Introducing our bold new look

www.libertyutilities.com/newbrand



Reliable, affordable service for our communities matters. A greener, cleaner and more sustainable future matters.

When you do things with heart, you can do both. Every day we're adopting clean, sustainable energy solutions to reduce our carbon emissions. We're also developing powerful new ways to let you better control and enjoy your water.

Our new logo better reflects the type of company we've become.

This Radiant Heart design reflects our commitment to you. It symbolizes how clean, sustainable energy and water are the heartbeat of our homes and communities.

The transition to our new logo will happen over time. We're proud to be a part of our community and excited to introduce you to our new look.

We promise to never forget that you, our customer, are at the heart of everything we do.

Find out more:
www.libertyutilities.com/newbrand

