

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

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| In the Matter of The Empire District |) | |
| Electric Company d/b/a Liberty, The |) | |
| Empire District Gas Company, Liberty |) | |
| Utilities (Missouri Water), LLC d/b/a Liberty |) | |
| Utilities, and Liberty Utilities (Midstates |) | Case No. AU-2021-0072 |
| Natural Gas) Corp. d/b/a Liberty Utilities |) | |
| for Accounting Authority Orders Allowing |) | |
| the Electric, Gas, Water, and Wastewater |) | |
| Utilities to Record and Preserve Costs |) | |
| Related to COVID-19 |) | |

MECG RESPONSE TO COMMISSION ORDER

COMES NOW the Midwest Energy Consumers Group (“MECG”), and for its Response to the Commission’s November 18, 2020 *Order Directing Responses* respectfully states as follows:

1. MECG agrees with the responses provided by Staff in its Response. MECG believes that there is a significant degree of commonality between the AAO requests from each of the Liberty entities to justify treating the AAO in a single docket. In fact, like Staff, MECG has conducted discovery that anticipates the AAO request being processed as a single docket with a common procedural schedule. MECG also agrees that, by processing in this manner, a significant amount of administrative efficiency can be attained in that the parties will only have to prepare one piece of testimony, appear at one evidentiary hearing and file one legal brief. For this reason, MECG would urge the Commission to treat the Liberty Utilities’ AAO request in a single docket.

2. In the event that the Commission decides to split into multiple dockets and recognizing that MECG has already conducted the necessary discovery to proceed on all of the AAO requests, MECG would ask that it be treated as a party in all of the AAO dockets.

WHEREFORE, MECG provides this response to the Commission's Order Directing Filing.

Respectfully submitted,

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ATTORNEY FOR THE MIDWEST ENERGY
CONSUMERS' GROUP

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by email, facsimile or First Class United States Mail to all parties by their attorneys of record as provided by the Secretary of the Commission.

/s/ David Woodsmall
David L. Woodsmall

Dated: November 23, 2020