

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

In the Matter of the Verified Application and)	
Petition of Liberty Energy (Midstates) Corp.)	<u>Case No. GO-2014-0006</u>
d/b/a Liberty Utilities to Change its Infrastructure)	Tracking No. YG-2014-0004
System Replacement Surcharge.)	

**POSITION STATEMENT
OF LIBERTY UTILITIES**

COMES NOW Liberty Energy (Midstates) Corp. d/b/a Liberty Utilities (“Liberty Utilities”), and pursuant to the Commission’s September 13, 2013, *Order Establishing Procedural Schedule and Other Procedural Requirements* respectfully submits its Position Statement on the issues filed in this proceeding on September 19, 2013.

1. Should the Commission approve an incremental ISRS (infrastructure system replacement surcharge) revenue requirement increase for Liberty Utilities in this case?

Yes. The Commission should find that Liberty Utilities’ Petition and supporting documentation complies with the requirements of Sections 393.1009 to 393.1015, RSMo. and Commission Rule 4 CSR 240-3.265 governing ISRS petitions and ISRS eligible projects, and approve the incremental ISRS revenue requirement increase for Liberty Utilities in this case.

The Commission Staff had sufficient information to make an informed report (pursuant to Section 393.1015.2(2)), subject to final adjustment as described in its Updated Report filed September 20, 2013. As discussed in its Updated Report, Staff’s “investigation included a review of the Application, all supporting documentation, Missouri statutory sections 393.1009, 393.1012 and 393.1015 RSMo and all additional data provided by Liberty.”

Section 393.1015.2(4) provides: “If the commission finds that a petition complies with the requirements of sections 393.1009 to 393.1015, the commission shall enter an order authorizing the corporation to impose an ISRS that is sufficient to recover appropriate pretax revenue, as determined by the commission pursuant to the provisions of section 393.1009 to 393.1015.”

2. (i) What amount of incremental ISRS revenue requirement increase should the Commission approve for Liberty Utilities in this case (total and by district), and (ii) what composite/cumulative ISRS rate should Liberty Utilities be authorized to file for each customer class by district based on such increase?

(i) In accordance with the Staff Updated Report filed in this matter on September 20, 2013, the Commission should approve an incremental ISRS revenue requirement increase in the amount of annual pre-tax revenues of \$608,589, consisting of \$31, 956 for the WEMO district, \$185,181 for the SEMO district, and \$391,452 for the NEMO district, subject to final adjustments that Staff may propose.

(ii) Liberty Utilities should be authorized to file a composite/cumulative ISRS rate for each customer class by district as reflected in Schedule JM-1 in Appendix 2 to the Staff Updated Report, subject to final adjustments that Staff may propose.

Respectfully submitted,

/s/ Larry W. Dority

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing Response was served on all counsel of record on this 24th day of September, 2013 by hand-delivery, fax, electronic or regular mail.

/s/ Larry W. Dority

Larry W. Dority