BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Liberty Utilities)(Midstates Natural Gas) Corp. d/b/a)Liberty Utilities' Tariff Revisions Designed)To Implement a General Rate Increase)For Natural Gas Service in the Missouri)Service Areas of the Company.)

Case No. GR-2018-0013

<u>LIBERTY UTILITIES' MOTION TO FILE SUPPLEMENTAL</u> <u>DIRECT TRUE-UP TESTIMONY AND SCHEDULES</u>

COMES NOW Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Utilities ("Liberty Utilities" or "Company") and, pursuant to Commission Rule 4 CSR 240-2.130 (10), submits this Motion to File Supplemental Direct True-Up Testimony and Schedules. In support thereof, Liberty Utilities respectfully states as follows:

1. On April 20, 2018, Liberty Utilities filed its Direct True-up Testimony and Trueup Accounting Schedules in this case. Consistent with the recommendations previously made by the parties and approved by the Commission in its November 7, 2017 *Notice of Ruling Made at Procedural Conference Establishing Test Year*, the Company's True-up Filing was based on the test year ending June 30, 2017, as updated through December 31, 2017, and trued-up for certain known and measurable changes through March 31, 2018.

2. Subsequent to this filing, the Commission Staff advised Liberty Utilities that the Staff's ability to audit and respond to the Company's true-up filing had been compromised by the fact that the Company had based its filing on a comprehensive update of all revenue, expense and rate base items through December 31, 2017, which was then further trued-up by the Company for known and measurable changes through March 31, 2018. The Staff agrees that all

rate base items should be updated through December 31, 2017 and then trued-up through March 31, 2018. It apparently expected that only select changes in revenues and operating expenses, however, would be updated beyond the June 30, 2017 ending date of the test year in this proceeding.

3. While the Company believes that the approach it took in developing its true-up filing was appropriate and in accord with the procedural orders in this case, it also wants to be as responsive as possible to Staff's auditing needs. To that end, the Company has restated its accounting schedules and revised its direct true-up testimony to be more consistent with Staff's expectations. The Company respectfully requests that Commission permit Liberty Utilities to submit this restated information by accepting the supplemental direct true-up testimony of Charles Evans and supplemental true-up accounting schedules which have been filed on this same date.

WHEREFORE, Liberty Utilities respectfully requests that the Commission issue its Order permitting the Company to submit and accepting the supplemental direct true-up testimony of Charles Evans and supplemental true-up accounting schedules which have been filed on this same date.

Respectfully submitted,

/s/ James M. Fischer_

James M. Fischer, MBN 27543 Michael C. Pendergast MBN 31763 Fischer & Dority, P.C. 101 Madison Street, Suite 400 Jefferson City, MO 65101 Telephone: (573) 636-6758 Facsimile: (573) 636-0383 Email: jfischerpc@aol.com Email: mcp2015law@icloud.com Attorneys for Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Utilities

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic transmission to parties of record on this 4th day of May, 2018.

/s/ James M. Fischer

James M. Fischer