

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

In the Matter of Liberty Utilities (Midstates Natural Gas) Corp.’s Proposed Weather Normalization Adjustment Rider Tariff Sheet Filings)) Case No. GT-2021-0047)

MOTION FOR VARIANCE

COMES NOW Liberty Utilities (Midstates Natural Gas) Corp. (“Liberty” or “Company”), and for its Motion for Variance, respectfully states as follows to the Missouri Public Service Commission (“Commission”):

1. Liberty’s approved Weather Normalization Adjustment Rider (“WNAR”) requires use of the actual heating degree days (“HDD”) at the weather station in Kirksville, Missouri, in the formula for calculating the weather normalization adjustment (“WNA”) factor.
2. On February 6, 2020, the Kirksville weather station, USC00234544, ceased operating and reporting of the actual weather data needed by Liberty to comply with the filing requirements of the WNAR tariff provisions. Absent a replacement for the Kirksville station, Liberty would not have a HDD measurement basis required by its tariff provisions. As such, Liberty’s WNAR tariff needs to be changed, and, until such time, Liberty requires a variance from its tariff.
3. As an alternative to the Kirksville weather station, Liberty is requesting a change to its tariff sheet to replace Kirksville with Chillicothe actual HDDs, as adjusted. The adjusted HDDs reflect the application of variance factor between the 30-year HDD normalization of the Chillicothe and Kirksville stations.
4. Liberty, however, intends to continue to use the normal HDDs for Kirksville in its WNAR filings. The Chillicothe HDDs will reflect the application of a variance factor between the 30-year HDD normalization of the Chillicothe and Kirksville stations. By

applying this factor, Chillicothe's actual HDDs are adjusted to a level that Liberty believes provides a reasonable HDD substitute for the Kirksville area.

5. In line with the foregoing, on August 19, 2020, Liberty filed a tariff sheet to reflect a change in the weather station used to generate data for determining the Company's WNAR rate to be charged to Liberty's customers, from Kirksville to Chillicothe, as adjusted.
6. On August 21, 2020, the Staff of the Commission filed a Motion to Suspend Tariff Sheet, and on August 24, 2020, the Commission issued its *Order Suspending Tariff*, opening Case No. GT-2021-0047.
7. As required by its tariff provisions, on August 31, 2020, Liberty submitted revised tariff sheets to reflect the October adjustment made pursuant to Liberty's WNAR for the six month period ending September 2020 and Liberty's Current Semiannual WNA reconciliation for the twelve month period ending September 30, 2020.
8. The revised tariff sheets submitted on August 31, 2020, reflect the closure of the Kirksville weather station and the use of the Chillicothe station, as adjusted.

WHEREFORE, Liberty Utilities (Midstates Natural Gas) Corp. submits its Motion for Variance and requests an order allowing its WNAR tariff filings to use the Chillicothe weather station, as adjusted, in the formula for calculating the WNA factor. Liberty requests such additional and further relief as is just and proper under the circumstances.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that the above document was filed in EFIS on this 31st day of August, 2020, with notice of the same sent to all counsel of record.

/s/ Diana C. Carter