



October 7, 2021

VIA ELECTRONIC FILING

Mr. Morris Woodruff, Secretary
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

RE: Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty (“Midstates”)
Case No. GT-2022-0079; Tracking No. JG-2022-0058

Dear Judge Woodruff:

On September 16, 2021, Midstates initiated a “GT” case and submitted revised tariff sheets designed to narrowly amend Midstates’ Rider PGA to allow flexibility to extend the Purchased Gas Adjustment (“PGA”) Actual Cost Adjustment (“ACA”) recovery period beyond 12 months, with a proposed effective date of October 22, 2021.

To address concerns that were raised by the Staff of the Commission, Midstates is submitting substitute revised tariff sheets. The tariff language has been revised to clarify that an extended recovery period would only be for under-recovery situations, to add Staff and OPC as parties that may request an extended recovery period, and to clarify the carrying cost request language. The specific sheets being filed are as follows:

Form No. 13 PSC MO No 2	2 nd Revised Sheet No. 43 and
Form No. 13 PSC MO No 2	Original Sheet No. 43a.

As substitutes, these sheets continue to bear an issue date of September 16, 2021, and a requested effective date of October 22, 2021.

As noted with the initial filing, the requested tariff changes do not immediately impact rates or charges or the Company’s revenue requirement. Instead, the revisions will provide the possibility for Midstates to defer certain costs that would otherwise be due in the near future under the Company’s current PGA/ACA tariff and potentially lengthen the recovery period for the fuel costs stemming from the extraordinary weather event that occurred in February of 2021. The specific recovery proposal will be made by the Company in the PGA/ACA submission to be filed by Midstates between October 15 and November 4, 2021.

Please do not hesitate to contact me with any questions or concerns you may have regarding this substitute tariff filing.

Sincerely,

Diana Carter

Liberty Utilities (Midstates Natural Gas) Corp.
d/b/a Liberty Utilities or Liberty

FOR – All Areas

Name of Issuing Corporation

Community, Town or City

PURCHASED GAS ADJUSTMENT CLAUSE (CONT'D)

Such over- or under-recovery shall be determined by a monthly comparison of the actual (as billed) cost of gas as shown on the books and records of Company, and the cost recovery for the same month calculated by multiplying the volumes sold during said month by the sum of the currently effective cost components (the regular PGA factor and the prior period "Actual Cost Adjustment" ACA factor as herein defined).

For each twelve month billing period ended with the August revenue month, the difference of the comparisons described above, including any balance or credit for the previous year, shall be accumulated to produce a cumulative balance of over-recovered or under-recovered costs. However, the initial ACA period following the effective date of this tariff shall be the the fifteen (15) month period from June 2006 through August 2007 for the Northeast area and the West area (excluding Butler) and shall be the twelve (12) month period ending August 2007 for the Southeast area, the Kirksville area and the West area (Butler only). ACA factors shall be computed by dividing the cumulative balance of the over-recoveries or under-recoveries by the estimated volumes of total sales during the subsequent twelve-month period. This adjustment shall be rounded to the nearest \$0.00001 per Ccf and applied to billings, beginning with the effective date of the Winter PGA. These ACA factors shall remain in effect until superseded by subsequent ACA factors calculated according to this provision. Company shall file any revised ACA factors in the same manner as all other adjustments performed in the PGA clause.

Upon request by the Company, Staff, or OPC, and for good cause shown, when an extraordinary event has occurred, supported by affidavit, the Commission may permit the Company to divide the cumulative balances of each System's deficit gas cost recovery revenue (ACA account under-recovery) by estimated sales volumes for an extended period which shall not exceed 5 years.

Carrying costs shall be determined in the following manner:

For each month during the ACA period and for each month thereafter, at a simple rate equal to the prime bank lending rate (as published in the Wall Street Journal on the first business day of the following month), minus two (2) percentage points, shall be credited to customers for any over-recovery of gas costs or credited to the Company for any under-recovery of gas costs. Interest shall be computed based upon the average of the accumulated beginning and ending monthly over or under recoveries of all PGA related costs. The Company shall maintain detailed workpapers that provides the interest calculation on a monthly basis. The Staff and Public Counsel shall have the right to review and propose adjustments to the Company's monthly entries to the interest calculation.

DATE OF ISSUE: September 16, 2021
month day yearDATE EFFECTIVE: October 22, 2021
month day yearISSUED BY: Matthew DeCoursey Vice President Rates and Regulatory Strategy
name of officer titleLondonberry, NH
address

Liberty Utilities (Midstates Natural Gas) Corp.
d/b/a Liberty Utilities or Liberty

FOR – All Areas

Name of Issuing Corporation

Community, Town or City

PURCHASED GAS ADJUSTMENT CLAUSE (CONT'D)

If the Commission allows the Company to divide the cumulative balances of each System's deficit gas cost recovery revenue (under-recovery ACA balance) by estimated sales volumes for an extended period not to exceed five years, the Company may propose a carrying cost, subject to review, appropriate for the length of the extended period. If a hearing is required regarding the Company's request for Carrying Costs, it shall take place concurrently with the hearing for the ACA period that contains the extraordinary gas costs.

IV. REFUNDS

Any refunds the Company receives in connection with natural gas services purchased, together with any interest included in such refunds, will be refunded to the Company's applicable customers unless otherwise ordered by the Commission. Such refunds shall be credited to the ACA account in the month received and shall receive interest as part of the overall ACA interest calculation.

DATE OF ISSUE: September 16, 2021
month day yearDATE EFFECTIVE: October 22, 2021
month day yearISSUED BY: Matthew DeCoursey Vice President Rates and Regulatory Strategy
name of officer titleLondonberry, NH
address