

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

In the Matter of the Application of Rate)
Increase Request for Liberty Utilities (Missouri)
Water), LLC d/b/a Liberty Utilities)

File No. WR-2018-0170

RENEWED MOTION TO COMPEL DISCOVERY

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Renewed Motion to Compel Discovery* hereby respectfully states:

1. On December 15, 2017, Liberty Utilities (Missouri Water), LLC d/b/a Liberty Utilities (“Liberty Utilities” or “Company”) filed its rate increase request with the Missouri Public Service Commission (“Commission”).
2. On March 12, 2018, Staff filed its *Motion to Compel Discovery* of seven Data Requests that the Company had provided insufficient responses to.
3. On March 12, 2018, the Commission issued its *Order Setting Discovery Conference* ordering a conference call between the parties on March 13, 2018.
4. On March 13, 2018, prior to the conference call between all parties, Liberty Utilities agreed to provide all outstanding information detailed in the *Motion to Compel Discovery*. During the discovery call, Liberty Utilities agreed to comply with the requests for discovery by the end of that week, March 16, 2018.
5. As of this filing, Staff has yet to receive a sufficient response to Data Request No. 34, despite continued communication with the Company, in adherence with 2 CSR 240-2.090(8)(A).

WHEREFORE, Staff requests the Commission issue an order requiring Liberty Utilities to respond to this motion to compel; compelling Liberty Utilities to provide the discovery requested in DR 34, as detailed in Staff's *Motion to Compel*; and grant such other and further relief as is appropriate under the circumstances.

Respectfully submitted,

/s/ Casi Aslin

Casi Aslin
Legal Counsel
Missouri Bar No. 67934
Attorney for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Mo 65102-0360
(573) 751-8517
casi.aslin@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand delivered, transmitted by facsimile or electronically mailed to all counsel of record this 30th day of March, 2018.

/s/ Casi Aslin