

August 31, 2020

VIA ELECTRONIC FILING

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

RE: Case No. GT-2021-0047 Liberty Utilities (Midstates Natural Gas) Corp. ("Liberty") Weather Normalization Adjustment Rider ("WNAR")

Dear Judge Woodruff:

I am providing herewith to the Missouri Public Service Commission for filing, in electronic form, the following revised tariff sheets:

Form 13 - P.S.C. MO. No. 2, 5th Revised Sheet No. 67.2; Form 13 - P.S.C. MO. No. 2, 5th Revised Sheet No. 67.3; Form 13 - P.S.C. MO. No. 2, 5th Revised Sheet No. 67.4; and Form 13 - P.S.C. MO. No. 2, 5th Revised Sheet No. 67.5.

I am also submitting a Motion for Variance. On August 19, 2020, Liberty submitted a revised tariff sheet, Form 13 - P.S.C. MO. No. 2, 2nd Revised Sheet No. 67, to reflect a change in the weather station to be used for the data for Liberty's WNAR. That tariff sheet was suspended, initiating Case No. GT-2021-0047. The revised tariff sheets being submitted today reflect the new weather station, and, as such, a variance from Liberty's tariff currently in effect is required.

The revised tariff sheets, which have an issue date of August 31, 2020, and an effective date of October 1, 2020, are designed to reflect the October adjustment made pursuant to Liberty's WNAR for the six month period ending September 2020. The WNAR adjustment is (\$0.00201) for residential customers in the Northeast and West Districts, \$0.00609 for residential customers in the Southeast District, (\$0.00075) for small general service customers in the Northeast and West Districts, and \$0.00210 for small general service customers in the Southeast District. The rates are calculated semiannually to adjust for actual heating degree days as they differ from the normal levels and are effective for twelve months.

Liberty's WNAR tariff states that the Company shall determine the Semiannual Reconciliation Rate ("SRR") based on the over- or under-billing during the twelve month billing of



each Current Semiannual WNA ("CSWNA") and SRR using the effective CSWNA and SRR rates and nine months actual sales and three months projected sales. This filing includes Liberty's CSWNA reconciliation for the twelve month period ending September 30, 2020. This CSWNA reconciliation establishes the SRR rates to be effective October 1, 2020. The SRR adjustment is (\$0.00162) for residential customers in the Northeast and West Districts, \$0.00121 for residential customers in the Southeast District, \$0.00122 for small general service customers in the Northeast and West Districts, and \$0.00061 for small general service customers in the Southeast District.

Compared to currently existing rates, and assuming normal usage, the WNAR adjustment will increase the average monthly bill of the typical residential customer by approximately:

\$0.97 per month, or 1.67% for the Northeast District; \$0.90 per month, or 1.59% for the West District; and \$0.23 per month, or 0.52% for the Southeast District.

Such bill impacts may be less or more depending on a customer's actual usage, which is largely affected by weather.

Please bring these filings to the attention of the Commissioners and the appropriate Commission personnel, and please let me know if you have any questions.

Sincerely,

Diana Carter