



March 15, 2019

VIA EFIS

Secretary Morris Woodruff  
Missouri Public Service Commission  
Governor Office Building  
200 Madison Street  
Jefferson City, MO 65101

Dear Secretary Woodruff:

On behalf of Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Utilities (“Liberty Utilities” or “Company”), enclosed herewith for filing with the Missouri Public Service Commission are the revised tariff sheets, P.S.C. MO. No. 2, Revised Sheet Nos. 67.2 – 67.5.

These revised tariff sheets, which have an issue date of March 15, 2019, and an effective date of April 15, 2019, are designed to reflect the April adjustment made pursuant to the Company’s Weather Normalization Adjustment Rider (“WNAR”) for the six month period ending January, 2019 as provided by Sheet Nos. 67-2 to 67.5 of the Company’s tariffs. The WNAR adjustment is (\$0.01387) for residential customers in the Company’s Northeast and West District; \$0.00254 for residential customers in the Company’s Southeast District; (\$0.00590) small general service customers in the Northeast and West District and \$0.00097 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 (12) months.

Compared to currently existing rates, and assuming normal usage, the WNAR adjustment would decrease the average monthly bill of the typical residential customer by about \$0.74 per month, or 1.13 % in the Company’s Northwest and West Districts and would increase the average monthly bill of the typical residential customer by about \$0.13 or 0.23% in the Company’s Southeast District. Such bill impacts may be less or more depending on a customer’s actual usage, which is primarily affected by weather.

As the Commission is aware, the Company requested and was granted a variance to file its WNAR adjustment on March 15, 2019 so that it could reflect the outcome of the Commission’s decision in Case Nos. GO-2019-0058 and GO-2019-0059, two cases involving Spire Missouri that bear on how similar provisions in that Company’s WNAR tariff should be interpreted. Because a decision in that case has not yet been issued by the Commission, the Company is filing its WNAR based on Staff’s ranking method. Because Liberty Utilities believes that Staff’s ranking method may introduce additional volatility into the calculation of WNAR adjustments and resulting rates, the Company continues to reserve the right to revise its adjustment based on the Commission’s ultimate decision in these cases.

Thank you for bringing this matter to the attention of the appropriate Commission personnel.

Sincerely,

Jill Schwartz  
Senior Manager, Rates and Regulatory Affairs  
Liberty Utilities Central Region