

McMellen, Amanda

From: McMellen, Amanda
Sent: Wednesday, July 15, 2015 10:07 AM
To: Chris Krygier
Cc: 'Jill Schwartz'
Subject: Liberty Utilities (MNG)_GAS_2014 Missouri PSC Annual Report_Review of Company Response Complete

The Missouri Public Service Commission (Commission) has received your response to its deficiency notice regarding the 2014 Annual Report of [Liberty Utilities \(MNG\)](#). Commission Staff has reviewed the response and has verified that it correctly addresses all deficiencies reported with the explanations included in the emails below. Therefore, no further response on behalf of the Company regarding Staff's initial review is required. This response have been reviewed only for procedural errors and omissions and is not a financial statement attested to by the Commission.

While your report has been initially accepted by the Commission, further reviews are possible based upon the types of information provided. Should a subsequent review reveal deficiencies not previously identified, you will be notified of the deficiencies and any actions you are required to take.

The above response is for informational purposes only and **DOES NOT REQUIRE A COMPANY RESPONSE**, however, if you have any questions, please feel free to contact me. When contacting the Commission concerning your report, please reference the following identification number: [BMAR-2015-1906](#).

Sincerely,

Amanda McMellen

Utility Regulatory Auditor
Missouri Public Service Commission
200 Madison Street, Ste 440, PO Box 360
Jefferson City, MO 65102-0360
Ph: (573) 526-3482; Fax: (573) 526-4994
email: amanda.mcmellen@psc.mo.gov

CONFIDENTIALITY NOTICE: This e-mail message including attachments, if any, is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message. If you are the intended recipient but do not wish to receive communications through this medium, please so advise the sender immediately.

From: Jill Schwartz [mailto:Jill.Schwartz@libertyutilities.com]
Sent: Monday, July 06, 2015 5:14 PM
To: McMellen, Amanda
Cc: Chris Krygier
Subject: RE: Liberty Utilities (MNG)_GAS_2014 Missouri PSC Annual Report Deficiency

Ms. McMellen,

As a follow-up to our phone conversation last Thursday, and prior to my complete resubmission of the MO annual report for 2014, I wanted to touch base with you to make sure I have sufficiently addressed all of your items below. Attached is a draft of our MO annual report resubmission for your review. Additionally, please see my responses in red to your initial list of items.

- 1) The correct annual report form was not used for this submission. Each year, the Commission authorizes the current annual report form to be utilized for submissions. Notification is sent to each company's Annual Report contact representative, either via email or regular mail, indicating where to download the current form. The current year's form must be utilized. Therefore, a complete resubmission, in its entirety, using the correct form is necessary.

The correct form and instructions can be obtained on the Commission's website at: [www.http://psc.mo.gov](http://psc.mo.gov) then clicking the Forms box on the left hand side of the page, selecting the Water/Sewer link, or by contacting the Commission @ www.annualreports.mo.gov

Response: I have downloaded the 2014 Gas Annual Report form from the website. Please see the attached draft resubmission.

- 2) The Company's name was incorrectly listed. The report must include any d/b/a names on each line where the Company's name is requested. Our records indicate the Company's current certificated name is [Liberty Utilities \(MNG\)](#). The name currently listed on the report will need to be changed to reflect the correct certificated name.

Response: Per our conversation on July 2, 2015, and in accordance with docket numbers GM-2012-0037 and GN-2014-0090, the Company's name is correctly listed as Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Utilities.

- 3) Page 5 Gas Utility Plant in Service amounts listed in the Balance at Beginning of Year column do not match the amounts reported in the 2013 annual report Balance at End of Year column.

Response: For 2013 annual reporting purposes, the \$3M balance in FERC 101 was allocated to the associated 3xx FERC accounts. The 2014 Beginning Balances do not include the \$3M of Plant in Service costs recorded to FERC 101 at the beginning of 2014. Because the template downloaded from the MO PSC website is protected, I am not able to add a footnote to Page 5 to explain this difference.

- 4) Page 7 Revenues by Schedules numbers reported in the Average No. of Natural Gas Customers Previous Year column do not match the numbers reported in the 2013 annual report Current Year column.

Response: I have updated Page 7 to reflect the natural gas customers reported in 2013. However, the 2013 annual report did not include a breakout for Medium Firm General Service Customers.

- 5) Pages 114 – 115 (Missouri Jurisdictional), the amounts for Prior Year to Date Balance column do not match the amounts recorded in the 2013 annual report Current Year column.

Response: All of the differences between 2013 ending balances and 2014 beginning balances on Pages 112-115 are a result of a change in the reporting classification on the annual report. Please see footnotes added to Pages 112-115 to identify and explain the differences.

- 6) Page 208 (Missouri Jurisdictional), the amounts reported in Balance at Beginning of Year column do not match the amounts reported in the 2013 annual report Balance at End of Year column.

Response: Similar to #3 and #5 above, the differences on Page 208 are a result of a change in the reporting classification on the annual reports, as well as the allocation of FERC 101 to the 3xx FERC accounts for 2013 reporting purposes. Please see footnotes added to Page 208.

- 7) FERC Form 2a Page 110 Lines 28 and 29 the amounts reported in Prior Year End Balance column do not match the amounts reported in the 2013 annual report Current Year End of Quarter/Year Balance column.

Response: For #s 7-18 (below) I am working on a reconciliation of the differences between the 2013 ending balances and the 2014 beginning balances. Similar to #5 and #6 above, the differences are a result of a change in the reporting classification from year to year. In total, all of the costs are accounted for, but were reported differently from year to year.

- 8) FERC Form 2a Page 111 Lines 63 and 64 the amounts reported in Prior Year End Balance column do not match the amounts reported in the 2013 annual report Current Year End of Quarter/Year Balance column.
- 9) FERC Form 2a Page 112 Line 29 the amounts reported in Prior Year End Balance column does not match the amount reported in the 2013 annual report Current Year End of Quarter/Year Balance column.
- 10) FERC Form 2a Page 113 Lines 35, 38, 40, 41 and 55 the amounts reported in Prior Year End Balance column do not match the amounts reported in the 2013 annual report Current Year End of Quarter/Year Balance column.
- 11) FERC Form 2a Pages 114 - 115 Lines 2, 4, 5, 6, 8, 14, 25 and 26 the amounts reported in Prior Year to Date Balance column do not match the amounts recorded in the 2013 annual report Current Year column.
- 12) FERC Form 2a Page 116 Lines 27, 39, 52, 59, 60, 71 and 78 the amounts reported in Prior Year to Date Balance column do not match the amounts recorded in the 2013 annual report Current Year column.
- 13) FERC Form 2a Page 118-119 Lines 20, 22 and 23 the amounts reported in Prior Quarter Year to Date Balance column do not match the amounts recorded in the 2013 annual report Current Quarter Year column.
- 14) FERC Form 2a Page 120 the amounts reported in Previous Year to Date column do not match the amounts recorded in the 2013 annual report Current Year to Date column.
- 15) FERC Form 2a Page 120a the amounts reported in Previous Year to Date column do not match the amounts recorded in the 2013 annual report Current Year to Date column.
- 16) FERC Form 2a Page 278 the amounts reported in Balance at Beginning of Current Quarter/Year do not match the amounts recorded in the 2013 annual report Balance at End of Current Quarter/year.
- 17) FERC Form 2a Page 321 the amounts reported in Amount for Previous Year column do not match the amounts recorded in the 2013 annual report Amount for Current Year column.
- 18) FERC Form 2a Page 322 the amount reported in Amount for Previous Year column does not match the amount recorded in the 2013 annual report Amount for Current Year column.

Please give me a call at your convenience when you return to the office this week. Before I file our complete resubmission, I'd like to discuss a plan to address your concerns.

Thanks so much!

Jill Schwartz | Liberty Utilities - Central | Utility Rates and Regulatory Manager
P: 573-755-0607 | C: 573-352-0045 | F: 573-243-1531
E: Jill.Schwartz@libertyutilities.com
2751 N. High St. | Jackson, MO 63755

CONFIDENTIALITY NOTICE

The information contained in this e-mail and all attachments may contain privileged or confidential information. If you are not the intended recipient or received this communication by error, please notify the sender and delete the message and all attachments from your system without copying or disclosing it.

From: Chris Krygier
Sent: Tuesday, June 16, 2015 3:42 PM
To: McMellen, Amanda
Cc: Jill Schwartz
Subject: RE: Liberty Utilities (MNG)_GAS_2014 Missouri PSC Annual Report Deficiency

Ms. McMellen,

I am in receipt of your email, we will review and follow-up with any questions.

Chris

Christopher D. Krygier | [Liberty Utilities](#) | Director, Regulatory and Government Affairs
P: 573-755-0100 | C: 623-377-2603 | F: 573-243-1531
E: Chris.Krygier@LibertyUtilities.com
2751 N. High St. | Jackson, MO 63755



CONFIDENTIALITY NOTICE

The information contained in this e-mail and all attachments may contain privileged or confidential information. If you are not the intended recipient or received this communication by error, please notify the sender and delete the message and all attachments from your system without copying or disclosing it.