

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

In the Matter of the Application of Liberty)
Utilities (Midstates Natural Gas) Corp. d/b/a)
Liberty for an Order Granting Billing Variances) Case No. GE-2024-0046
Related to the Company’s Implementation of its)
Customer First Program)

**RESPONSE TO STAFF RECOMMENDATION
AND REQUEST FOR ORDER**

COMES NOW Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty (“Liberty”) and respectfully submits this Response to Staff Recommendation and Request for Order:

1. On September 22, 2023, the Staff Recommendation was filed herein. Staff recommends that the Commission waive the 60-day notice requirement, waive the requirement of mailing to a local newspaper, and approve Liberty’ variance requests subject to certain conditions.

2. Liberty does not object to Staff’s recommended conditions, and Liberty requests that the Commission issue an order to allow for the implementation of Liberty’s new customer information and billing system on October 9, 2023, with billing variances needed for the months of October and November of 2023.

WHEREFORE, Liberty respectfully requests, for good cause shown, that the Commission waive the notice requirement of 20 CSR 4240-4.017(1), grant the requested temporary billing variances from 20 CSR 4240-13.015(1)(C) and 20 CSR 4240-13.020(6), and issue its order on an expedited basis.

Respectfully submitted,

/s/ Diana C. Carter
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CERTIFICATE OF SERVICE

I hereby certify that the above document was filed in EFIS on this 26th day of September, 2023, and sent by electronic transmission to the Staff of the Commission and the Office of the Public Counsel.

/s/ Diana C. Carter