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)	

REPLY REGARDING OPC'S RESPONSE TO STAFF'S RECOMMENDATION

COMES NOW Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty ("Liberty") and respectfully submits this Reply to OPC's Response to Staff's Recommendation:

- 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. As stated in Liberty's filing on September 26, 2023, Liberty does not object to Staff's recommended conditions.
- 3. On September 26, 2023, OPC filed its response to the Staff Recommendation, stating that OPC "also does not oppose Liberty's plan to implement new software." Liberty does not oppose the additional condition recommended by OPC in its response.
- 4. At this time, 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 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 28th 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