

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

In the Matter of the Request of Liberty)	
Utilities (Midstates Natural Gas) Corp.)	<u>File No. GR-2024-0106</u>
d/b/a Liberty to Implement a General Rate)	Tracking No. JG-2024-0111
Increase for Natural Gas Service in the)	
Missouri Service Areas of the Company)	

**STAFF RESPONSE TO LIBERTY MIDSTATES TEST YEAR
AND UPDATE PERIOD PROPOSAL**

COMES NOW Staff of the Missouri Public Service Commission (Staff), by and through the undersigned counsel, and for its *Staff Response Liberty Utilities (Midstates Natural Gas) d/b/a Liberty (“Liberty Midstates”) Test Year and Update Period Proposal* respectfully states as follows:

1. As stated in the Commission’s Order Giving Notice, Setting a Deadline to Intervene, Setting a Deadline to Respond to Test Year, and Directing a Proposed Schedule (“Order”) issued on February 15, 2024, “Liberty proposes a test year of the twelve months ending December 31, 2022 and further proposes the test year be updated through December 31, 2023.”¹
2. The Order further provided that “[a]ny party wishing to respond to Liberty Midstates proposed test year shall do so no later than March 13, 2024” and that “[n]o later than March 27, 2024, the parties shall submit a joint proposed procedural schedule as described in this order. The Staff of the Commission shall coordinate and file the joint proposed procedural schedule.”

¹ Liberty Midstates has not proposed, nor requested, a true up period in this matter. As noted in the Direct testimony of Liberty Midstates witness Charlotte T. Emery, P. 8, ¶. 14-22, Liberty Midstates used a twelve month test year ending December 31, 2022, to develop its case and proposes an update period through December 31, 2023.

3. Staff does not necessarily² oppose the twelve-months ending December 31, 2022, test year with an update period through December 31, 2023, as proposed by Liberty Midstates in the Direct Testimony of Charlotte T. Emery **so long as** (1) the Commission adopts a procedural schedule for these proceedings approximating the proposed schedule to be filed by Staff on March 27, 2024, **and** (2) any procedural order the Commission would issue in this matter reserves the right for any party to request a true up period at a later date if the audit and evidence justifies one.

WHEREFORE, Staff respectfully submits this Staff Response to Liberty Midstates Test Year and Update Period Proposal.

Respectfully submitted,

/s/ J. Scott Stacey

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**ATTORNEY FOR STAFF OF THE
PUBLIC SERVICE COMMISSION**

² Staff has concerns with the test year due to it being stale, as the data in the proposed test year was between 13-25 months old at the time of the Company's direct filing. Further concerns include the billing data given the Company's change in billing system that included partial and makeup billing periods, as well as changes to the billing cycles near the end of the Company's proposed update period.

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record this 13th day of March, 2024.

/s/ J. Scott Stacey