

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

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

**LIBERTY’S PROPOSED PROCEDURAL SCHEDULE**

**COMES NOW** Liberty Utilities (Midstates Natural Gas) d/b/a Liberty (“Liberty” or “Company”), by and through undersigned counsel, propose the following procedural schedule:

1. The test year of the 12 months ending December 31, 2022 was established for this case. See Commission’s Order Establishing Test Year, issued and effective March 21, 2024, at ordering paragraph 1. As explained in Company witness Charlotte Emery’s direct testimony, at page 5, lines 5-7, and at page 8, lines 17-20, the test year ending December 31, 2022 was used as the basis for the general rate change requested by the Company, and adjustments had been proposed for known and measurable changes to the test year that will be updated through December 31, 2023.

2. Commission Staff and the Office of Public Counsel (“OPC”) have already begun propounding data requests (“DRs”) to the Company, and many seek cost data beyond the test year including cost data from 2023. The Company will provide actual cost data from the 12 months ending December 31, 2023 as they are available in response to DRs. However, the Company will need time to incorporate the actual 2023 financial data into its revenue requirement models following close of 2023 books.

3. Liberty is in the process of finalizing or “closing” its books for the year ended December 31, 2023, and it will not be possible for Liberty to update its discrete adjustments for the December 31, 2023 update period by April 30, 2024, as proposed by the Non-Liberty Parties.

4. Therefore, Liberty recommends that the Commission adopt the following Procedural Schedule, which is the same as the proposed procedural schedule being filed by Staff, OPC, and the Missouri School Board Association (“MSBA”) (collectively “Non-Liberty Parties”), with one exception regarding the date for Liberty to provide the updated revenue requirement models. Liberty proposes to update the pro forma adjustments using actual data through December 31, 2023 by mid-2<sup>nd</sup> quarter 2024 (between May 17 – June 3, 2024), rather than April 30, 2024, as proposed by the Non-Liberty Parties.

5. Since the Liberty updated information will only be discrete items, the Non-Liberty Parties will not be prejudiced by a later filing date for this information. Under Liberty’s proposed procedural schedule, the Staff and Public Counsel will still have one-month to review Liberty’s discrete updated adjustments before the Staff and Public Counsel’s Direct Testimony for the Revenue Requirement issues will need to be filed on July 18, 2024.

6. The other provisions related to the scheduling of local hearings, technical and settlement conferences, discovery conditions, and other procedural rules being proposed by the Non-Liberty Parties are acceptable to Liberty.

7. For the reasons stated herein, Liberty respectfully requests that the Commission adopt the following procedural schedule:

<b>EVENT</b>	<b>DATE</b>
Discovery Conference	April 15, 2024
Technical Conference on Transportation Tariff	April 30, 2024
Discovery Conference	May 13, 2024
Technical Conference on Transportation Tariff	May 28, 2024
Discovery Conference	June 10, 2024
LU to provide update info (through 12/31/2023) (Accounting schedules that support a specific updated revenue requirement for the Company using actual data through 12/31/2023)	May 17 – June 3 2024
Technical Conference on Transportation Tariff	July 1, 2024
Discovery Conference	July 15, 2024
Direct testimony – Revenue Requirement (COS) (All parties except Liberty Midstates) (Response time for data requests changes to 10 calendar days and 5 calendar days to object or notify of the need for additional time to respond)	July 18, 2024
Direct testimony – Class Cost of Service and Rate Design (all parties except Liberty Midstates)	August 1, 2024
Technical & Settlement Conference	August 14, 2024
Discovery Conference	August 15, 2024
Rebuttal Testimony Response time to data requests changes to 5 business days and 3 business days to object or notify of the need for additional time to respond	August 22, 2024
Technical Conference on Transportation Tariff	August 23, 2024
Technical & Settlement Conference	September 9 – 10, 2024
Discovery Conference	September 12, 2024
Surrebuttal and Cross-Surrebuttal	September 19, 2024
Preliminary Issues List, Order of Witnesses, Opening Statements, and Cross Examination, and Reconciliation Circulated among Parties (Not Filed)	September 20, 2024
Settlement Conference	September 26 – 27, 2024
List of Issues, List of Exhibits, Order of Witnesses, Opening Statements, and Cross Examination – Filed	September 27, 2024
Last Day to Request Discovery Except for Rate Case Expense	October 1, 2024
Parties to Submit Final Valuation of Positions to Staff for Final Reconciliation	October 1, 2024

Discovery Conference and Procedural Conference if Necessary	October 2, 2024
Last Day to Take Deposition or File Discovery Motions	October 4, 2024
Statements of Position	October 4, 2024
Reconciliation	October 10, 2024
Evidentiary Hearing	October 15 – 18, 2024 October 21 – 22, 2024
Initial Post-Hearing Briefs	November 15, 2024
Last Day to Request Rate Case Expense Discovery	November 22, 2024
Reply Briefs and Update Briefs	November 26, 2024
Proposed Adjustments to Rate Case Expense (if any)	December 16, 2024
End of Suspension Period/Effect of Law Date	January 8, 2025

**WHEREFORE**, Liberty respectfully requests the Commission order the procedural schedule identified above.

Respectfully submitted,

/s/ Jermaine Grubbs

Jermaine Grubbs MBE #68970  
Liberty Utilities (Midstates Natural Gas)  
Corp. d/b/a Liberty  
602 S. Joplin Ave.  
Joplin, Missouri 64802  
(417) 317-9024  
[Jermaine.Grubbs@LibertyUtilities.com](mailto:Jermaine.Grubbs@LibertyUtilities.com)

and

James M. Fischer MBN# 27543  
Fischer & Dority, P.C.  
2081 Honeysuckle Lane  
Jefferson City, MO 65109  
Cell Phone: (573) 353-8647  
Email: [jfischerpc@aol.com](mailto:jfischerpc@aol.com)

ATTORNEYS FOR Liberty Utilities  
(Midstates Natural Gas) d/b/a Liberty  
("Liberty Midstates")

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record this 27<sup>th</sup> day of March, 2024.

**/s/ James M. Fischer**  
James M. Fischer