

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) Case No. GR-2024-0106
Liberty to Implement a General Rate)
Increase for Natural Gas Service in the)
Missouri Service Areas of the Company)

PUBLIC COUNSEL’S NOTICE OF DISCOVERY DISPUTE

COMES NOW the Office of the Public Counsel (“OPC”) and, as the Commission directed in its April 10, 2024, *Order Setting Procedural Schedule*, hereby notifies the Commission that the OPC and Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty (“Liberty”) have a disagreement regarding the following OPC data requests (“DRs”):

3006. Please provide all minutes, materials, presentations, etc. involving Algonquin Power & Utilities Corporation’s (“APUC”) Strategic Review Committee, formed in May 2023.

and

3009. Please provide or provide access to Algonquin Power & Utilities Corp.’s Board of Director’s (BOD)/Members’ materials/presentations from January 1, 2021, to present, updating a new materials/presentations become available.

The disagreement is over Liberty’s objections to DR 3006 and DR 3009:

The Company objects to both DR 3006 and DR 3009 because they are overly broad; not proportional to the needs of the case considering the totality of the circumstances; and not relevant or reasonably calculated to lead to the discovery of admissible evidence in this proceeding.

WHEREFORE, the Office of the Public Counsel notifies the Commission of the foregoing discovery disagreement in advance of the discovery conference scheduled for 10:00 a.m., July 15, 2024, in anticipation of the Commission taking it up then.

Respectfully,

/s/ Anna Martin
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 10th day of July 2024.

/s/ Anna Martin