

**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	)	

**STAFF’S STATEMENT OF DISCOVERY DISAGREEMENTS AND CONCERNS**

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through undersigned counsel, and for its *Statement of Discovery Disagreements and Concerns*, states as follows:

1. Staff’s concerns are as follows:

A. DRs 103 and 103.1 were propounded to Liberty Utilities (Midstates Natural Gas) Corp., d/b/a Liberty (“Liberty Midstates”) on February 21, 2024 and June 10, 2024, respectively. Responses were received from Liberty Midstates on March 15, 2024 and July 1, 2024, respectively. The responses were inadequate in that Staff requested all information used to calculate the incentive compensation amounts; however, the Company did not provide the Central Regional scorecards as required. Liberty Midstates had stated on June 27, 2024, it would send these documents; however, it has not done so. Staff requires the complete set of data in order to complete its analysis.

B. Moreover, DR 103.1 response was also deficient as the response did not provide detail for the 2018 and 2019 payouts, which prevents Staff from determining what Liberty Midstates paid for union incentive compensation, STIP, and SBP. Staff requires the complete set of data in order to complete its analysis.

C. DR 154 was propounded on February 26, 2024, and responded to on March 22, 2024. However, the received response was deficient and must be supplemented.

The response did not include invoices for low-income weatherization amount for 2018-2023. Staff needs those invoices in order to complete its analysis.

2. The requested information is necessary for Staff to prepare its case and to audit the Company's compliance with applicable Missouri statutes, Commission regulations, orders, and approved stipulations. In a general rate case such as this one, all of the necessary information is in the possession of the utility. Without the cooperation of the requesting utility, Staff cannot determine whether or not a rate increase is needed or how much of an increase is actually needed. Such a situation is necessarily deeply prejudicial to the Company's ratepayers and cannot be permitted.

**WHEREFORE**, Staff submits this Statement of Discovery Disagreement or Concern in advance of the Discovery Conference currently scheduled for July 15, 2024, at 10:00 a.m.

Respectfully submitted,

**/s/ J. Scott Stacey**

J. Scott Stacey  
Deputy Counsel  
Missouri Bar No. 59027  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102  
573-522-6279  
573-751-9285 (Fax)  
[scott.stacey@psc.mo.gov](mailto:scott.stacey@psc.mo.gov)

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

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record this 10<sup>th</sup> day of July, 2024.

**/s/ J. Scott Stacey**