BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Request of Liberty Utilities)	
(Missouri Water) LLC d/b/a Liberty for Authority to)	
Implement a General Rate Increase for Water)	File No. WR-2024-0104
and Wastewater Service Provided in its Missouri)	
Service Areas)	

STAFF STATEMENT OF DISCOVERY CONCERNS

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

- 1. Staff's concerns are as follows regarding data requests (DRs) issued to Liberty Utilities (Missouri Water) LLC d/b/a Liberty ("Company"):
- a. DR 25, Booked and Billed Sales. This response was initially due by April 17, 2024. The Company provided an initial response on April 17, 2024, and a supplemental response on June 17, 2024. Staff reached out to the Company on June 26, 2024, because neither response contains gallons pumped. The response has not been updated.
- b. As part of the procedural schedule the Company agreed to provide an update to Staff through April 30, 2024 by July 1, 2024. After Staff reached out to the Company, they informed Staff on July 9, 2024 that their "goal" was to update the affected DRs¹ by July 17, 2024.

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¹ DRs that need to be updated are 2, 3, 4, 7, 8, 14, 17, 19, 21, 22, 23, 24, 26, 28, 29, 30, 33, 35, 37, 38, 39, 43, 44, 47, 48, 49, 50, 52, 58, 59, 70, 73, 80, 131, 132, 133, 134, 135, 136, 137, 138, 139.1, 145, 184, 185, 186, 187, 188, 191, 197, 198, 205, 206, 213, 229, 230, 233, 234, 238, 240, 241, 242, 243, 246, 247, 252, 253, 254, 255, 256, 257.

- c. DR 117, Cash working capital. The response was initially due by April 28, 2024 and was responded to on April 29, 2024. Staff reached out to the Company on June 6, 2024 requesting more invoices. The response has not been updated.
- 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.

WHEREFORE, Staff submits its' *Statement of Concerns* in advance of the Discovery Conference currently scheduled for July 15, 2024 at 10:00 a.m.

Respectfully submitted,

<u>/s/ Casi Aslin</u>

Casi Aslin
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or electronically mailed to all parties and or counsel of record on this 11th day of July, 2024.

/s/ Casi Aslin