

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    ) Case No. WR-2024-0104  
for Authority to Implement a General Rate        )  
Increase for Water and Wastewater Service     )  
Provided in its Missouri Service Areas         )

**PUBLIC COUNSEL’S NOTICE OF DISCOVERY DISPUTE**

**COMES NOW** the Office of the Public Counsel (“OPC”) and, as the Commission directed in its May 9, 2024, *Order Setting Procedural Schedule*, hereby notifies the Commission that the OPC and Liberty Utilities (Missouri Water) LLC 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.

This disagreement is identical to the disagreement and purpose for the July 15 discovery conference in Case No. GR-2024-0106. For that reason, the OPC requests the Commission address both cases in a single discovery conference.

**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 submitted,

/s/ Marc Poston  
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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 11<sup>th</sup> day of July 2024.

/s/ Marc Poston