

**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 Increase for Natural     )     Case Nos. GR-2024-0106  
Gas Service Provided in the Missouri Service     )  
Areas of the Company     )

**OBJECTION TO OPC DATA REQUEST 1300.2**

OPC DR 1300.2: WP tab MO-5, associated with Mr. McCuen, shows annual MO State NOLs from 2012 to present. Please provide *all* of the official, complete, consolidated federal and Missouri state income tax returns to verify these annual NOL numbers. Proforma individual returns are not acceptable.

OBJECTION: This data request is overly broad and unduly burdensome; is not proportional to the needs of the case considering the totality of the circumstances; and wrongly asserts that proforma individual returns are not acceptable. Without waiving the foregoing objection, please refer to the Company’s: (1) supplemental response to MPSC DR 124 in the above-captioned matter, which explains in pertinent part as follows: “Copies of the 2018, 2019, 2020, 2021 and 2022 consolidated US federal income tax returns and consolidated Missouri state income tax returns of Liberty Utilities (America) Corp., which incorporate financial information of the Company, are available to be viewed by appointment at our office located at 428 E. Capitol Ave., Suite 303, Jefferson City, Missouri;” and (2) response to MPSC DR 132.1 in the above-captioned matter. Please reach out to Jermaine Grubbs (jermaine.grubbs@libertyutilities.com) and Amy Evers (amy.evers@libertyutilities.com) to schedule the review of copies of the 2018-2022 consolidated US federal income tax returns and consolidated Missouri state income tax returns of Liberty Utilities (America) Corp.

/s/ Jermaine Grubbs  
Jermaine Grubbs MBE #68970  
Liberty Utilities (Midstates Natural Gas)

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