

**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) Case No. GR-2024-0106
Increase for Natural Gas Service in the)
Missouri Service Areas of the Company)

PUBLIC COUNSEL DATA REQUEST NOS. 3000-3017

The Office of Public Counsel (Public Counsel) hereby presents the following Data Requests to Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty pursuant to Commission Rule 20 CSR 4240-2.090. Public Counsel asks that Liberty respond to these requests within 20 calendar days as required by Commission rule. Please provide electronic responses to the following: opcservice@opc.mo.gov, david.murray@opc.mo.gov, anna.martin@opc.mo.gov, and marc.poston@opc.mo.gov. Each of these data requests is continuing in nature and requires supplemental responses as soon as further or different information is obtained that is responsive to it.

DEFINITIONS

As used herein, the words “document” or “documents” include any original and all copies of any written, printed, typed, electronically stored, or graphic matter of any kind or nature, however produced or reproduced, now in your possession, custody or control, or in the possession, custody or control of your agents, representatives, employees of you or any and all persons acting in your behalf, including documents at any time in the possession, custody or control of such individuals or entities, or known by you to exist.

DATA REQUESTS

3000. With respect to Schedules JC-18 and JC-19 attached to John Cochrane’s direct testimony, please provide the same information for the quarterly periods ending December 31, 2021 through September 30, 2022 and March 31, 2023 through March 31, 2024.

3001. In response to Staff Data Request No. 9 in which Staff requested a current copy of Liberty Utilities Company's current strategic plan, Liberty Utilities (Midstates Natural Gas) Corp. ("MNG") provided a copy of the 2021 Strategic Plan. Please confirm that Liberty Utilities Company has not updated its strategic plan since 2021. Why hasn't Liberty Utilities updated its strategic plan since 2021? Does Algonquin Power & Utilities Corporation have a more recent strategic plan that includes strategies related its regulated utility operations? If so, please provide such. If not, why not?

3002. In response to Staff Data Request No. 61, MNG provided a pdf document indicating the average cost of short-term debt for MNG, LUCo and APUC. Please provide the underlying Excel files supporting the indicated average cost of short-term debt for MNG, LUCo and APUC for 2022 and 2023.

3003. What is the allowance for funds used during construction (AFUDC) rate (and the supporting calculations) applied to MNG's construction work in progress (CWIP) for the period March 31, 2018 through December 31, 2023?

3004. What are the monthly asset balances for accrued AFUDC-debt and accrued AFUDC-equity for MNG for the period March 31, 2018 through December 31, 2023, and, for each asset balance, what is the general ledger account number associated with it?

3005. What amount of credit rating agency fees is included in MNG's requested revenue requirement in this case? Please specific the fees by rating agency and the allocation percentage used to determine the amount to allocated to MNG.

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

3007. On a January 12, 2023 "Special Call" with investors, APUC's CFO, Darren G. Myers, communicated to APUC's investors that it had shared with rating agencies its "plan" announced on January 12, 2023. Please provide all information, including, but not limited to, all documents and presentations, provided to rating agencies as it relates to the "plan" announced on January 12, 2023.

3008. On its August 10, 2023 FQ2 earnings call with investors, APUC's Interim CEO, Christopher G. Huskison, communicated to APUC's investors that APUC would pursue a sale of its Renewable Energy Group. Please provide all information, including, but not limited to, all documents presentations, provided to rating agencies as it relates to APUC's strategic review process which resulted in APUC's decision to announce its intention to sell its Renewable Energy Group.

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 as new materials/presentations become available.

3010. Please provide or provide access to Liberty Utilities (Canada) Corp.'s Board of Director's (BOD)/Members' materials/presentations from January 1, 2021, to present, updating as new materials/presentations become available.

3011. Please provide or provide access to Liberty Utilities (America) Co.'s Board of Director's (BOD)/Members' materials/presentations from January 1, 2021, to present, updating as new materials/presentations become available.

3012. Please provide or provide access to Liberty Utilities (America) Holdings LLC's Board of Director's (BOD)/Members' materials/presentations from January 1, 2021, to present, updating as new materials/presentations become available.

3013. Please provide or provide access to Liberty Utilities (America) Holdco Inc.'s Board of Director's (BOD)/Members' materials/presentations from January 1, 2021, to present, updating as new materials/presentations become available.

3014. Please provide or provide access to Liberty Utilities Company's Board of Director's (BOD)/Members' materials/presentations from January 1, 2021, to present, updating as new materials/presentations become available.

3015. Please provide or provide access to Liberty Utilities (Central) Co.'s Board of Director's (BOD)/Members' materials/presentations from January 1, 2021, to present, updating as new materials/presentations become available.

3016. Please provide or provide access to Liberty Utilities Finance GP1.'s Board of Director's (BOD)/Members' materials/presentations from January 1, 2021, to present, updating as new materials/presentations become available.

3017. Please provide or provide access to The Empire District Electric Company's Board of Director's (BOD)/Members' materials/presentations from January 1, 2021, to present, updating as new materials/presentations become available.

Submitted April 26, 2024, by David Murray