

*Exhibit No.:*  
*Issue(s):* *Transport revenue and  
billing determinants*  
*Witness:* *Justin Tevie*  
*Sponsoring Party:* *MoPSC Staff*  
*Type of Exhibit:* *Rebuttal Testimony*  
*Case No.:* *GR-2024-0106*  
*Date Testimony Prepared:* *August 22, 2024*

**MISSOURI PUBLIC SERVICE COMMISSION**

**INDUSTRY ANALYSIS DIVISION**

**TARIFF AND RATE DESIGN DEPARTMENT**

**REBUTTAL TESTIMONY**

**OF**

**JUSTIN TEVIE**

**LIBERTY UTILITIES (Midstates Natural Gas) CORP.,**

**d/b/a Liberty**

**CASE NO. GR-2024-0106**

*Jefferson City, Missouri*  
*August 2024*

**\*\* Denotes Confidential Information \*\***

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REBUTTAL TESTIMONY OF  
JUSTIN TEVIE  
LIBERTY UTILITIES (Midstates Natural Gas) CORP.,  
d/b/a Liberty  
CASE NO. GR-2024-0106**

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Rebuttal Testimony of  
Justin Tevie

1           A.     In Staff’s direct filing the wrong billing determinants were used for some rate  
2 classes, particularly those in the Southeast Missouri (“SEMO”) profit center. Some were  
3 based on Liberty Midstates original response to Data Request (DR) No. 0325 and had to be  
4 updated to reflect the Company’s revised response to the data request.

5           Q.     Did Staff find issues with the original billing determinants submitted by  
6 the Company?

7           A.     Yes. The billing determinants submitted by the Company, in DR No. 0325,  
8 were fraught with some irregularities that were pointed out to the Company.

9           Q.     Did the Company correct the irregularities that Staff discovered in the  
10 DR response?

11          A.     Yes. The Company revised its response to DR No. 0325, which provided  
12 corrections to the billing determinants.

13          Q.     Please describe the impact the revision to the billing determinants had on the  
14 Staff’s revenue adjustments.

15          A.     The ending revenues, after all adjustments, reduced by approximately  
16 \*\* [REDACTED] \*\*.

17          Q.     Did Staff still have issues with the billing determinants after the Company  
18 submitted its revised data?

19          A.     Yes. Staff determined that there were some missing data, especially, for some  
20 special contracts customers.

21          Q.     How did the presence of missing data impact adjustments performed  
22 by Staff?

1           A.     Due to missing bill count data for certain months, Staff had to use its best  
2 judgement in performing annualizations, such as customer growth, for those customers.

3 **SPECIAL CONTRACTS**

4           Q.     Were there any changes to special contracts?

5           A.     Yes. The Company's response to DR No. 0325, and after discussions  
6 with the Company, indicated that \*\* [REDACTED] \*\* was no longer  
7 classified as a transport customer and \*\* [REDACTED] \*\* was no longer a  
8 Liberty Midstates customer.

9           Q.     Describe the impact these changes had on Staff's revenue adjustment  
10 calculations.

11          A.     They did not affect the revenue adjustments because Liberty Midstates  
12 did not provide any data on these entities in its data response so no revenues were assigned  
13 to them.

14          Q.     Did Staff have any concerns about the special contracts?

15          A.     Yes. Staff was of the opinion that the some of the agreements that are  
16 currently in place do not reflect current economic conditions. Staff currently recommends  
17 an adjustment in the amount of approximately \*\* [REDACTED] \*\* in rate revenue<sup>2</sup>.  
18 Additionally, \*\* [REDACTED]  
19 [REDACTED] \*\*.

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<sup>2</sup> GR-2024-0106, Direct Testimony of Justin Tevie, page 7, lines 2-4.

1 **CONCLUSION**

2 Q. What are your recommendations?

3 A. Staff recommends that transport revenues reported in Confidential  
4 Schedule MS-d2 should be reduced by approximately \*\* [REDACTED] \*\* as reported in  
5 Confidential Schedule MS-r1. Staff continues to recommend a revenue imputation of  
6 \*\* [REDACTED] \*\* based on a lack of justification provided by Liberty Midstates.

7 Q. Does this conclude your rebuttal testimony?

8 A. Yes, it does.

**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

In the Matter of the Request of Liberty )  
Utilities (Midstates Natural Gas) Corp. ) Case No. GR-2024-0106  
d/b/a Liberty to Implement a General Rate )  
Increase for Natural Gas Service in the )  
Missouri Service Areas of the Company )

**AFFIDAVIT OF JUSTIN TEVIE**

STATE OF MISSOURI )  
 ) ss.  
COUNTY OF COLE )

**COMES NOW JUSTIN TEVIE** and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Rebuttal Testimony of Justin Tevie*; and that the same is true and correct according to his best knowledge and belief.

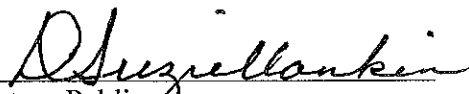
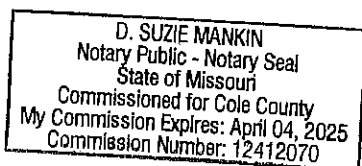
Further the Affiant sayeth not.



\_\_\_\_\_  
**JUSTIN TEVIE**

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 19<sup>th</sup> day of August 2024.

  
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Notary Public