



Liberty Utilities (Midstates Natural Gas) Corp. d.b.a. Liberty

Case No. GR-2024-0106

Office Public Counsel Data Request - 3049

Data Request Received: 2024-08-27

Response Date: 2024-09-17

Request No. 3049

Witness/Respondent: Jermaine Grubbs

Submitted by: David Murray, david.murray@opc.mo.gov

REQUEST:

In reference to the document assigned Bate Loge page number 138, please provide the underlying calculations supporting the following financial metrics: APUC – Debt/Capitalization, APUC – S&P FFO/Debt, and Weighted Average Cost of Capital.

RESPONSE:

Via objection sent by counsel August 30, 2024, Liberty objected to this DR to the extent it seeks calculations to be performed, which is beyond the proper scope of discovery. Liberty also incorporated its objection to OPC DR 3048 as it relates to Bates Log number 138. Without waiving the foregoing objection, the Company will make available for on-site review any calculations that were already performed and are available.

Please contact counsel for the Company, Jermaine Grubbs, at jermaine.grubbs@libertyutilities.com to coordinate the on-site review of the Highly Confidential materials.