

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Liberty Utilities)	
(Midstates Natural Gas) Corp. d/b/a)	
Liberty's Purchased Gas Adjustment)	<u>Case No. GR-2025-0138</u>
Tariff Filing)	Tariff No. JG-2025-0073

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission and for its Recommendation, states as follows:

1. On November 4, 2024, Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty ("Liberty Midstates") filed revised tariff sheets bearing an effective date of December 1, 2024, Tariff File No. JG-2025-0064, and an accompanying cover letter with supporting worksheets.

2. On November 5, 2024, Liberty Midstates withdrew the before mentioned tariff sheets and filed new tariff sheets bearing an effective date of December 1, 2024, Tariff File No. JG-2025-0065, and an accompanying cover letter with supporting worksheets.

3. On November 8, 2024, Liberty Midstates withdrew its revised tariff under JG-2025-0065 and filed a second revised substitute tariff sheet under JG-2025-0073 to address an error noted by the Staff of the Public Service Commission. The Company also submitted a single cover letter and supporting workpapers. These revised tariff sheets were filed to reflect changes in Liberty Midstates' Current Purchased Gas Adjustment ("CPGA") factors as a result of estimated changes in the cost of natural gas. Also included in this filing is the annual change to the Actual Cost Adjustment ("ACA").

4. The Commission issued a revised order on November 12, 2024 directing Staff to file a recommendation regarding Liberty Midstates' request and corresponding tariff sheet, Tariff File No. JG-2025-0073, no later than November 14, 2024.

5. Staff has reviewed Liberty Midstates' filings and determined that the rates in the proposed tariff sheet, Tariff No. JG-2025-0073, were calculated in conformance with Liberty Midstates' PGA Clause. Staff does not oppose the approval of this tariff sheet on less than thirty (30) days' notice. Such action is supported by Liberty Midstates' Commission-approved PGA Clause allowing for ten (10) business days' notice for PGA change filings.

6. Staff recommends the Commission approve the tariff sheet in Tariff File No. JG-2025-0073, on an interim basis, subject to refund, for service on and after December 1, 2024.

7. Due to the limited time available to review the documentation supporting the ACA factors Liberty Midstates submitted in this filing, Staff requests the Commission order Staff to submit its results and recommendations regarding the information in this ACA filing to the Commission on or before December 15, 2025.

WHEREFORE, for the foregoing reasons and those stated in Staff's Memorandum attached hereto, Staff recommends that the Commission issue an order approving Liberty Midstates' tariff sheet filed in Tariff No. JG-2025-0073, on an interim, subject to refund status; and further order Staff to file its recommendation Liberty Midstates' ACA filing no later than December 15, 2025.

P.S.C. MO. No. 2

32nd Revised Sheet No. 44, Cancelling 31st Revised Sheet No. 44

Respectfully submitted,

/s/ J. Scott Stacey

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**Attorney for Staff of the
Missouri Public Service Commission**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record this 14th day of November, 2024.

/s/ J. Scott Stacey

MEMORANDUM

TO: Missouri Public Service Commission Official Case File,
Case No. GR-2025-0138, Tariff No. JG-2025-0073
Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Midstates

FROM: Kimberly Tones, CPA, CIA – Lead Senior Utility Regulatory Auditor
Procurement Analysis Department

/s/ David M. Sommerer 11/14/2024
Financial and Business Analysis Div./Date

SUBJECT: Staff Recommendation for Liberty Utilities (Liberty Midstates) Annual PGA Tariff
Filing Effective December 1, 2024

DATE: November 14, 2024

On November 4, 2024, Liberty Utilities (Midstates Natural Gas) Corp., d/b/a Liberty (“Liberty Midstates” or “Company”), filed three (3) tariff sheets under JG-2025-0064 bearing a proposed effective date of December 1, 2024, along with a single page cover letter and supporting workpapers for Liberty Midstates’ affiliated company, Empire District Gas. Empire District Gas is a separate local distribution company, and although under common ownership, operates under a separate set of tariffs from Liberty Midstates. Thus, the tariffs filed by the Company in this case, on November 4th were not for the correct local distribution company for Case No. GR-2025-0138. On November 5, 2024, Liberty Midstates withdrew its tariff filing under JG-2025-0064 and filed one (1) revised tariff sheet with corrected cover letter and supporting worksheets.

On November 8, 2024, Liberty Midstates withdrew its revised tariff under JG-2025-0065 and filed a second revised substitute tariff sheet under JG-2025-0073 to address an error noted by Staff. A single page cover letter and supporting workpapers were also submitted. The second revised substitute tariff sheet was filed to reflect changes in Liberty’s Purchased Gas Adjustment (“PGA”) factors as the result of estimated changes in the cost of natural gas for the upcoming winter season and changes in the Actual Cost Adjustment (“ACA”) factors.

Liberty Midstates’ filing proposes decreases in PGA rates per hundred cubic feet (“Ccf”) for all customer classes by division as noted below:

West Area (WEMO)	Current PGA	Proposed PGA	Increase/ (Decrease)
Firm	\$ 0.86923	\$ 0.40152	\$ (0.46771)
Interruptible	\$ 0.81032	\$ 0.23501	\$ (0.57531)

Kirksville (KIRK)	Current PGA	Proposed PGA	Increase/ (Decrease)
Firm	\$ 0.54489	\$ 0.40228	\$ (0.14261)
Interruptible	\$ 0.50730	\$ 0.23776	\$ (0.26954)

Northeast (NEMO)	Current PGA	Proposed PGA	Increase/ (Decrease)
Firm	\$ 0.54904	\$ 0.07037	\$ (0.47867)
Interruptible	\$ 0.44219	\$ 0.15859	\$ (0.28360)

Southeast (SEMO)	Current PGA	Proposed PGA	Increase/ (Decrease)
Firm	\$ 0.48712	\$ 0.36170	\$ (0.12542)
Interruptible	\$ 0.36314	\$ 0.22529	\$ (0.13785)

On November 12, 2024, the Commission issued “Order Updating Tracking Number for Staff Recommendation and other Responses” to Liberty Midstates’ Purchased Gas Adjustment Tariff Filing for Staff to file a recommendation with regard to Tracking No. JG-2025-0073 no later than November 14, 2024.

Case No. GR-2025-0138, under which these changes were filed, was established to track Liberty Midstates’ natural gas costs to be reviewed in its 2023-2024 ACA filing. Liberty Midstates established Case Nos. GR-2023-0253 and GR-2023-0128 to track its annual natural gas costs to be reviewed in their 2022-2023 and 2021-2022 ACA filings, respectively. These rate changes should be made on an interim basis, subject to refund pending final Commission decisions in this case (Case No. GR-2025-0138) and ACA Case Nos. GR-2023-0128 (2021-2022 ACA period) and GR-2023-0253 (2022-2023 ACA period).

The Staff has verified that the Company has filed its annual report and is not delinquent on any assessment. Staff has reviewed this filing and is not aware of any issue currently pending before the Commission that affects or is affected by this filing, other than those mentioned above.

Due to the limited time available to review the documentation supporting the ACA factors submitted in this filing, the Procurement Analysis Department (“PAD”) requests permission to submit its results and recommendations regarding the information included in this ACA filing to the Commission on or before December 15, 2025.

Staff has reviewed this filing and determined that the rates on the proposed tariff sheet are calculated in conformance with Liberty Midstates’ PGA Clause. Staff does not oppose the approval of this tariff sheet on less than thirty (30) days’ notice. Such action is supported by Liberty Midstates’ Commission-approved PGA clause allowing for notice of ten (10) business days for PGA change (both increases and decreases) filings.

Therefore, Staff recommends that the following tariff sheet filed on November 8, 2024, be approved on an interim basis, subject to refund, with an effective date of December 1, 2024.

P.S.C.MO. No. 2, 32nd Revised Sheet No. 44, Cancelling 31st Revised Sheet No. 44

