

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

In the Matter of Liberty Utilities (Midstates )  
Natural Gas) Corp.’s Purchased Gas Adjustment ) Case No. GR-2023-0128  
Tariff Filing )

**LIBERTY’S FURTHER RESPONSE TO STAFF’S RECOMMENDATION**

COMES NOW Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty (“Liberty” or the “Company”) and submits this *Further Response to Staff’s Recommendation* regarding Liberty’s Purchased Gas Adjustment (“PGA”) Tariff filing. In this regard, Liberty respectfully states as follows to the Missouri Public Service Commission (“Commission”):

1. On November 4, 2022, Liberty filed a tariff sheet to reflect changes in the Company’s PGA clause and Actual Cost Adjustment (“ACA”) and Refund Factor for the 2021-2022 period. Liberty sought to extend the recovery period for its Western Missouri service area relating to extraordinary costs stemming from Winter Storm Uri. Liberty also sought a carrying charge of 7.4%.

2. On December 12, 2023, the Staff of the Commission (“Staff”) filed a recommendation and memorandum regarding its review of Liberty’s 2021-2022 ACA filing.

3. On December 13, 2023, the Commission issued its *Order Directing Response*, directing Liberty to respond to Staff’s recommendations by January 11, 2024.

4. On January 11, 2024, the Company filed its *Response to Commission Order* explaining that Liberty accepted Staff’s analysis and all but one of Staff’s recommendations. The only recommendation that Liberty took exception with was the Staff’s proposed adjustment related to carrying costs for the Storm Uri balance. The Company stated, at para. 3: “No adjustment should be made at this time to reflect any change in carrying costs. Liberty will work with Staff to attempt

to reach agreement on this issue prior to the Company's next PGA filing (to be made November, 2024).”

5. Accordingly, Liberty has worked with Staff to reach an agreement on the carrying cost issue, and in order to resolve the issue for the Storm Uri balance only, Liberty agrees to calculation of carrying costs using the prime rate less 2%. The corresponding ending balances are reflected in Attachment A hereto and incorporated herein.

**WHEREFORE**, Liberty respectfully submits this *Further Response to Staff's Recommendation*, requests an order as soon as practicable be issued to set the Storm Uri balances in light of the resolution of the carrying cost issue, and all such relief as is just and proper under the circumstances.

Respectfully submitted,

/s/ Jermaine Grubbs

Jermaine Grubbs MBE #68970

602 S. Joplin Ave.

Joplin, Missouri 64801

Cell Phone: (417) 317-9024

E-Mail:

[Jermaine.Grubbs@LibertyUtilities.com](mailto:Jermaine.Grubbs@LibertyUtilities.com)

Attorney for Liberty Utilities (Midstates  
Natural Gas) d/b/a Liberty

**CERTIFICATE OF SERVICE**

I hereby certify that the above document was filed in EFIS on this 26th day of November, 2024, and sent by electronic transmission to the Staff of the Commission, the Office of the Public Counsel and counsel for intervenors.

/s/ Jermaine Grubbs