

**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)	

JOINT MOTION TO APPROVE AMENDED UNANIMOUS STIPULATION AND AGREEMENT AND FOR EXPEDITED TREATMENT

COMES Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty (“Liberty” or the “Company”), the Staff of the Missouri Public Service Commission (“Staff”), and the Office of the Public Counsel (“OPC”) (collectively, “Movants”), and pursuant to 20 CSR 4240-2.080, request the Commission approve the Movants’ *Amended Unanimous Stipulation and Agreement* on an expedited basis. In support of this *Motion*, the Movants state as follows:

1. On February 9, 2024, Liberty Midstates filed tariff sheets designed to implement a general rate increase for its gas service territory, together with supporting testimony.
2. On October 22, 2024, Movants filed a *Unanimous Stipulation and Agreement* (“Agreement”) resolving all issues in the above-captioned matter. The Missouri School Board Association (“MSBA”) is an intervenor in this matter and indicated that it did not oppose the Agreement.
3. On November 6, 2024, the Commission issued its *Order Approving Stipulation and Agreement*, with an effective date of November 16, 2024 and a deadline of November 20, 2024 to file compliance tariffs.
4. On November 20, 2024, Liberty filed compliance tariff sheets consisting of revised and original tariff sheets to comply with the Commission’s *Order Approving Stipulation and Agreement*.
5. Upon further review of the regulatory assets and liability balances set out in the Agreement, the Company discovered that the Excess ADIT Regulatory Liability balances –

both Federal and State – listed under paragraph 11 of the Agreement were incorrect. The wrong cells were pulled from a workpaper inadvertently.

6. Upon further review of the Weather Normalization Adjustment Rider (“WNAR”) tariff sheet revisions provided as **Schedule C** to the Agreement, the parties realized further revisions were needed including the addition of a few more sheets to allow for the transition to the annual filing process as outlined in the Rebuttal Testimony of Meagan Grafton.

7. After conferring with Staff and OPC, Movants have agreed to amend the Agreement to correct only those Federal and State Excess ADIT Regulatory Liability balances, the description of the WNAR changes in paragraph 16 of the Agreement, and provide a new **Amended Schedule C** via the attached *Amended Unanimous Stipulation and Agreement*, **Exhibit 1**.

8. The first change from the Agreement to the *Amended Unanimous Stipulation and Agreement* appears in paragraph 11, Regulatory Asset and Liability table, second column from the left, for the Excess ADIT Regulatory Liability balance at December 31, 2023 and is highlighted in yellow for ease of identification.

9. The second change from the Agreement to the *Amended Unanimous Stipulation and Agreement* appears in the second sentence in paragraph 16 to explain that the WNAR tariff sheets are now attached with calculated rates included and reference the new **Amended Schedule C**. This change is also highlighted in yellow for ease of identification.

10. The third change from the Agreement to the *Amended Unanimous Stipulation and Agreement* is the wholesale replacement of the original Schedule C to the Agreement with the new **Amended Schedule C**. This change is indicated by the upper, right-hand corner title, “**Amended Schedule C**.”

11. The third change — replacing **Schedule C** with the **Amended Schedule C** — impacts the compliance tariffs submitted by the Company on November 20, 2024; therefore, the Company is also substituting or adding the compliance WNAR tariff as shown in **Amended Schedule C** to the tariff revisions assigned EFIS tracking number JG-2025-0075.

12. The Movants seek expedited treatment and approval of **Exhibit 1**, the *Amended Unanimous Stipulation and Agreement*, by January 8, 2024 so that the Company’s accounting records can be clarified and the WNAR tariff revisions agreed upon by the Movants can become effective consistent with the effective date for new general rates in this case. The expedited treatment of this motion will have no negative effect on the Company’s customers or the general public. Since the inadvertent error in the Federal and State Excess ADIT Regulatory Liability balances was only recently discovered and then the Company and other parties had to discuss its correction, and the Movants have continually worked together to arrive at the appropriate WNAR tariff revisions, this request for expedited treatment and the *Amended Unanimous Stipulation and Agreement* were filed as soon as they could have been.

WHEREFORE, Movants respectfully request that the Commission approve the *Amended Unanimous Stipulation and Agreement* attached hereto as **Exhibit 1** on an expedited basis on or before January 8, 2025, and for any other relief the Commission may find appropriate.

Respectfully submitted,

/s/ Jermaine Grubbs

Jermaine Grubbs MBE #68970

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CERTIFICATE OF SERVICE

I hereby certify that the above document was filed in EFIS on this 17th day of December, 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
