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

In the Matter of Liberty Utilities)(Midstates Natural Gas) Corp. d/b/a)Liberty Utilities' Tariff Revisions Designed)To Implement a General Rate Increase)For Natural Gas Service in the Missouri)Service Areas of the Company.)

Case No. GR-2018-0013

## <u>LIBERTY UTILITIES' MOTION FOR EXPEDITED TREATMENT AND APPROVAL</u> OF COMPLIANCE TARIFFS ON LESS THAN 30 DAYS' NOTICE

**COMES NOW** Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Utilities ("Liberty Utilities" or "Company") and, pursuant to Commission Rules 4 CSR 240-2.065 and 4 CSR 240-2.080(14) submits this Motion for Expedited Treatment and Approval of Compliance Tariffs on Less than 30 Days' Notice. In support thereof, Liberty Utilities respectfully states as follows:

1. On May 24, 2018, Liberty Utilities, the Staff of the Missouri Public Service Commission ("Staff"), the Office of the Public Counsel ("OPC") and the Missouri Department of Economic Development, Division of Energy ("DE") filed a Unanimous Stipulation and Agreement ("Stipulation and Agreement") resolving all issues in this case.<sup>1</sup> Attachment 1 to the to the Stipulation and Agreement set forth specimen tariff sheets designed to implement various terms of the Stipulation and Agreement.

2. On June 6, 2018, the Commission issued its Order Approving Stipulation and Agreement ("Order"), effective June 16, 2018. In its Order, the Commission directed Liberty

<sup>&</sup>lt;sup>1</sup>Although not a signatory to the Stipulation and Agreement, Midwest Energy Consumers Group ("MECG") indicated that it has no objection to the Agreement, thereby permitting it to be treated as Unanimous under the Commission's Rules.

Utilities to file compliance tariffs consistent with the terms of the approved Stipulation and Agreement. Liberty Utilities filed such compliance tariffs on June 8, 2018 with the normal 30 day effective date.

3. Consistent with the terms of the Stipulation and Agreement approved by the Commission, Liberty Utilities respectfully requests that the Commission permit the compliance tariffs to go into effect on less than 30 days' notice. Specifically, Liberty Utilities requests that the compliance tariffs be permitted to become effective for service rendered on and after July 1, 2018.

4. Consistent with 4 CSR 240-2.080(14) of the Commission's Rules, Liberty Utilities submits that there is good cause for granting such relief and this Motion for Expedited Treatment in that:

A. The compliance tariffs filed by Liberty Utilities are identical in content to the specimen tariff sheets attached to the Stipulation and Agreement approved by the Commission, except for one technical rate adjustment necessary to begin implementation of the summer, inclining block rate for the WEMO and NEMO districts effective with the beginning of the Company's summer period, which will commence on May 1, 2019. For the remaining months of this summer period, the distribution commodity rate of \$0.33607 for firm residential service would continue to be used in the WEMO and NEMO districts.

B. Permitting the compliance tariffs to become effective on July 1, 2018, would have a beneficial, rather than negative effect, on the Company's customers and the general public in that it would permit the timely implementation of rates and terms of service that have been deemed just and reasonable by the Commission and give force and effect to one of the terms of

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Stipulation and Agreement that the Parties agreed were interdependent with other terms of the Agreement.

C. Liberty Utilities filed this Motion for Expedited Treatment as soon as it reasonably could have following the Commission's issuance of its Order in this case.

5. Liberty Utilities has conferred with counsel for the other Parties to this case, and they have all indicated that they have no objection to the relief requested herein, subject to their final review of the compliance tariffs.

WHEREFORE, Liberty Utilities respectfully requests that the Commission grant this Motion for Expedited Treatment and permit the Compliance Tariffs filed on June 8, 2018 to become effective for service on and after July 1, 2018.

Respectfully submitted,

/s/ James M. Fischer\_

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## **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic transmission to parties of record on this 8<sup>th</sup> day of June, 2018.

## /s/ James M. Fischer

James M. Fischer