

**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)
Tariff Filing)

Case No. GR-2025-0119
Tariff No. JG-2026-0066

STAFF RECOMMENDATION

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

1. On November 4, 2025, Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty ("Liberty Midstates") filed revised tariff sheets bearing an effective date of December 1, 2025, Tariff File No. JG-2026-0066, and an accompanying cover letter with supporting worksheets. The 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").

2. On November 5, 2025, the Commission issued an order directing Staff to file a recommendation regarding Liberty Midstates request and corresponding tariff sheets, Tariff File No. JG-2026-0066, no later than November 19, 2025.

3. On November 7, 2025, Liberty Midstates filed a substitute tariff under JG-2026-0066 to address a decimal error noted by Staff. Liberty Midstates also submitted a single cover letter to explain the reason for the substitution.

4. Staff has reviewed Liberty Midstates' filings and determined that the rates in the proposed substitute tariff sheet filed November 7, 2025, under Tariff No. JG-2026-0066, 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.

5. Staff recommends the Commission approve the substitute tariff sheet filed on November 7, 2025, in Tariff File No. JG-2026-0066, on an interim basis, subject to refund, for service on and after December 1, 2025.

6. 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, 2026.

WHEREFORE, for the foregoing reasons and those stated in Staff's Memorandum attached hereto and incorporated by reference herein, Staff recommends that the Commission issue an order approving Liberty Midstates' substitute tariff sheet filed on November 7, 2025, in Tariff No. JG-2026-0066, on an interim, subject to refund status; and further order Staff to file its recommendation Liberty Midstates' ACA filing no later than December 15, 2026.

P.S.C. MO. No. 2

33rd Revised Sheet No. 44, Cancelling 32nd Revised Sheet No. 44

Respectfully submitted,

/s/ J. Scott Stacey

J. Scott Stacey
Deputy Counsel
Missouri Bar No. 59027
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
573-522-6279
573-751-9285 (Fax)
scott.stacey@psc.mo.gov

**ATTORNEY FOR STAFF OF THE
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 17th day of November, 2025.

/s/ J. Scott Stacey

MEMORANDUM

TO: Missouri Public Service Commission Official Case File,
Case No. GR-2026-0119, Tariff No. JG-2026-0066
Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Midstates

FROM: Jamie Kliethermes – Utility Regulatory Auditor
Procurement Analysis Department

/s/ David M. Sommerer 11/17/2025
Financial and Business Analysis Div./Date

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

DATE: November 17, 2025

On November 4, 2025, Liberty Utilities (Midstates Natural Gas) Corp., d/b/a Liberty (“Liberty Midstates” or “Company”), filed one (1) tariff sheet bearing a proposed effective date of December 1, 2025. In addition, Liberty Midstates filed a cover letter and supporting worksheets. On November 7, 2025, Liberty Midstates filed a substitute tariff to address a decimal error. The substitute tariff sheet submitted bears the same issue and proposed effective dates as the originally filed tariff sheet.

The 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.

The cover letter makes the following representations about the pending PGA filing:

“As a result of this filing, for the Liberty West Area (WEMO), the effect of these changes will increase the firm PGA rate from the current \$0.40152 per Ccf (100 cubic feet) to \$0.46169 per Ccf. For the Kirksville area, the effect of these changes will increase the firm PGA rate from the current \$0.40228 per Ccf to \$0.54442. For the Northeast Area (NEMO), the effect of these changes will increase the firm PGA rate from the current \$0.07037 per Ccf to \$0.37234 per Ccf. For the Southeast Area (SEMO), the effect of these changes will increase the firm PGA rate from the current \$0.36170 per Ccf to \$0.50096 per Ccf.”

There is a significant increase in the proposed Total PGA rates for the Northeast (NEMO) region due to the elimination of a large credit that was part of the existing rates. This credit related to a refund from a FERC regulated interstate pipeline that the Company had credited to rates over the

past year. The impact of removing this one-time FERC-related refund for the ongoing Total PGA rates was a significant increase for the NEMO region.

On November 5, 2025, the Commission issued its ***Order Directing Staff Recommendation and Setting Time for Responses***. The order directs Staff to file its recommendation no later than November 19, 2025.

Case No. GR-2026-0119, under which these changes were filed, was established to track Liberty Midstates' natural gas costs to be reviewed in its 2024-2025 ACA filing. These rate changes should be made on an interim basis, subject to refund pending final Commission decisions in this case and ACA Case GR-2025-0138 (2023-2024 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, 2026.

Staff has reviewed this filing and determined that the rates on the proposed tariff sheet were calculated in conformance with Liberty Midstates' PGA Clause. Staff is of the opinion that good cause for approval of these tariff sheets on less than thirty (30) days' notice is supported by Liberty Midstates' Commission-approved PGA clause allowing for notice of ten (10) business days for PGA filings.

Therefore, Staff recommends that the following tariff sheet filed on November 7, 2025, be approved on an interim basis, subject to refund, with an effective date of December 1, 2025.

P.S.C.MO. No. 2, 33rd Revised Sheet No. 44, Cancelling 32nd Revised Sheet No. 44

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Liberty Utilities (Midstates)	<u>Case No. GR-2026-0119</u>
Natural Gas) Corp d/b/a Liberty's Purchased)	Tracking No. JG-2026-0066
Gas Adjustment Tariff Filing)	

AFFIDAVIT OF JAMIE KLIETHERMES

STATE OF MISSOURI)		
)		ss.
COUNTY OF COLE)		

COMES NOW JAMIE KLIETHERMES, and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation, in Memorandum form*; and that the same is true and correct according to her best knowledge and belief.

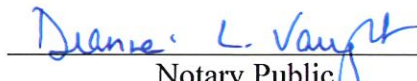
Further the Affiant sayeth not.



JAMIE KLIETHERMES

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 17th day of November 2025.



Notary Public

