

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

In the Matter of an Investigation into the)
Customer Service and Billing of Liberty)
Utilities Including Electric, Gas, and)
Water Utilities)
File No. OO-2025-0233

LIBERTY’S UNOPPOSED MOTION FOR EXTENSION

COME NOW The Empire District Electric Company, The Empire District Gas Company, Liberty Utilities (Midstates Natural Gas) Corp., and Liberty Utilities (Missouri Water) LLC (collectively, “Liberty”) and, as their Unopposed Motion for Extension, state as follows to the Missouri Public Service Commission (“Commission”):

1. On February 27, 2025, the Commission issued its *Order Opening an Investigation* (the “Order”) directing the Staff of the Commission (“Staff”) to conduct an investigation of Liberty’s electric, gas, and water customer service and billing practices and file a report when it completed the investigation.

2. On March 6, 2026, Staff filed the Staff Investigation Report (“Staff Report”), in compliance with the Commission’s direction. The Staff Report included an attached Investigation Report. Subsequently, the Commission issued its *Order Directing Filing* wherein it directed that Liberty respond to the Staff Report by April 8, 2026.

3. The Staff Report reflects a substantial level of analysis over an extended period, including review of thousands of customer bills, recorded calls, data requests, public meetings, and extensive engagement with Liberty personnel. Staff’s Investigation Report concludes with thirty-five (35) recommendations listed on pages 116-120.

4. Staff generally describes these recommendations as:

... including but not limited to: correcting estimation processes, improving billing and call center quality control, issuing refunds where overcharges have occurred,

strengthening training and compliance systems, improving communication regarding customer rights and Commission remedies, and updating internal and Commission-facing reporting and auditing processes. Staff explicitly recommends Commission oversight and follow-up regarding the adoption and effectiveness of these corrective actions.

(Staff Report, para. 24, pp. 7-8).

5. Liberty generally supports the thirty-five (35) recommendations identified by Staff. However, as to some of the recommendations, Liberty desires to have further conversations with Staff to confirm that it fully understands the steps envisioned, information to be maintained, and other matters so that there is no misunderstanding as Liberty moves forward.

6. As mentioned in the Investigation Report, Liberty has been working on several commitments made as the result of the recent Empire electric rate case (ER-2024-0261) and other matters. These matters include their own set of reporting and ongoing meetings with Staff, the Office of the Public Counsel (“OPC”), and other stakeholders. As a result, time for detailed discussion of the recommendations that are a part of the Investigation Report is somewhat limited.

7. Accordingly, in order to provide further time for discussion of the specific recommendations and Liberty’s thorough and informed response, Liberty requests a thirty-day extension of its time to respond to the Staff Report (or until May 8, 2026).

8. Liberty discussed this matter with counsel for Staff and OPC, and they have stated that they do not object to such extension.

WHEREFORE, Liberty respectfully requests the Commission grant the extension requested herein and issue such further orders as it may find to be just and proper under the circumstances.

Respectfully submitted,

ATTORNEYS FOR THE EMPIRE DISTRICT
ELECTRIC COMPANY, THE EMPIRE DISTRICT GAS

COMPANY, LIBERTY UTILITIES (MIDSTATES
NATURAL GAS) CORP., AND LIBERTY UTILITIES
(MISSOURI WATER) LLC

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CERTIFICATE OF SERVICE

I hereby certify that the above document was filed in EFIS on this 30th day of March, 2026, with notification of the same being sent to all counsel of record, and I further certify that the above document was sent by electronic transmission to all counsel of record.

/s/ Diana C. Carter