

Missouri Public Service Commission

Data Request

Data Request No. 0136
Company Name Liberty Utilities (Midstates Natural Gas) Corp.-Investor(Gas)
Case/Tracking No. GR-2018-0013
Date Requested 12/8/2017
Issue Expense - Allocations
Requested From Angela Cloven
Requested By Marcella Forck
Brief Description Algonquin employees, job descriptions, time sheets, and allocation of wages and benefits

Description For each officer and employee of Algonquin Power & Utilities Corp, please provide the following: a. Name and job title b. Job description and qualification for each position c. Time sheets for the period beginning July 2016 to date. Please continue to supplement this response throughout the discovery stage of this proceeding d. Wages, payroll taxes, benefits and any other labor-related costs for the twelve months ending June 30, 2015, June 30, 2016, June 30, 2017, and by month for the period beginning July 2016 to date, with a further breakdown of such cost into the following categories: i. Total direct-assigned cost to all entities (in total – not direct-assigned to each benefiting entity) by Type of Cost (i.e., CAM Table 1), and with a further breakout by FERC account for all direct-assigned costs ultimately charged to each regulated Missouri operation. ii. Total indirect costs allocated to all entities (in total – not allocated to each benefiting entity) by Type of Cost (i.e., CAM Table 1), with a further breakout by FERC account for any costs ultimately charged to each regulated Missouri operation. Please continue to update subpart (d) of this request throughout the discovery phase of this proceeding. DR requested by Jim Dittmer (jdittmer@utilitech.net).

Due Date 12/28/2017

The attached information provided to Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. GR-2018-0013 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Liberty Utilities (Midstates Natural Gas) Corp.-Investor(Gas) office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and

printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to Liberty Utilities (Midstates Natural Gas) Corp.- Investor(Gas) and its employees, contractors, agents or others employed by or acting in its behalf.

**Security
Rationale**

**Public
NA**

Missouri Public Service Commission**Data Request**

Data Request No. 0137
Company Name Liberty Utilities (Midstates Natural Gas) Corp.-Investor(Gas)
Case/Tracking No. GR-2018-0013
Date Requested 12/8/2017
Issue Expense - Allocations
Requested From Angela Cloven
Requested By Marcella Forck
Brief Description Algonquin corporate/shared services costs other than labor

Description Please provide Algonquin Power & Utilities Corp corporate/shared service costs other than labor and labor-related costs (i.e., payroll taxes, benefits and any other labor-related items) for the twelve months ending June 30, 2015, June 30, 2016, June 30, 2017, and by month for the period beginning July 2016 to date, with a further breakdown of such cost into the following categories: a. Total direct-assigned costs to all entities (in total – not direct-assigned to each benefiting entity) by Type of Cost (i.e., CAM Table 1), with a further breakout by FERC account for all costs ultimately charged to each regulated Missouri operation. b. Total indirect costs allocated to all entities (in total – not allocated to each benefiting entity) by Type of Cost (i.e., CAM Table 1), with a further breakout by FERC account for any costs ultimately charged to each regulated Missouri operation. Please continue to update subparts (a) and (b) of this request throughout the discovery phase of this proceeding. DR requested by Jim Dittmer (jdittmer@utilitech.net).

Due Date 12/28/2017

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**Security
Rationale**

**Public
NA**

Missouri Public Service Commission**Data Request**

Data Request No. 0138
Company Name Liberty Utilities (Midstates Natural Gas) Corp.-Investor(Gas)
Case/Tracking No. GR-2018-0013
Date Requested 12/8/2017
Issue Expense - Allocations
Requested From Angela Cloven
Requested By Marcella Forck
Brief Description Algonquin corporate/shared services budget variance reports

Description Please provide any annual budget variance reports that may have been prepared for calendar years 2015 and 2016 for Algonquin Power & Utilities Corp corporate/shared services costs, as well as any monthly or quarterly budget variance reports that may have been prepared for Algonquin Power & Utilities Corp corporate/shared services costs for the period July 2016 to date. Please continue to update this response as additional months of data becomes available throughout the discovery stage of this proceeding. DR requested by Jim Dittmer (jdittmer@utilitech.net).

Due Date 12/28/2017

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Security Public
Rationale NA

Missouri Public Service Commission**Data Request**

Data Request No.	0139
Company Name	Liberty Utilities (Midstates Natural Gas) Corp.-Investor(Gas)
Case/Tracking No.	GR-2018-0013
Date Requested	12/8/2017
Issue	Expense - Allocations
Requested From	Angela Cloven
Requested By	Marcella Forck
Brief Description	Algonquin budgeted corporate/shared services costs
Description	Please provide budgeted 2016 and 2017 Algonquin Power & Utilities Corp corporate/shared services costs by Type of Cost, and budgeted 2018 Algonquin Power & Utilities Corp corporate/shared services costs by Type of Cost as soon as available. DR requested by Jim Dittmer (jdittmer@utilitech.net).
Due Date	12/28/2017

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If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Liberty Utilities (Midstates Natural Gas) Corp.-Investor(Gas) office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to Liberty Utilities (Midstates Natural Gas) Corp.-Investor(Gas) and its employees, contractors, agents or others employed by or acting in its behalf.

Security	Public
Rationale	NA

Missouri Public Service Commission**Data Request**

Data Request No. 0144
Company Name Liberty Utilities (Midstates Natural Gas) Corp.-Investor(Gas)
Case/Tracking No. GR-2018-0013
Date Requested 12/8/2017
Issue Expense - Allocations
Requested From Angela Cloven
Requested By Marcella Forck
Brief Description Costs retained by Algonquin

Description To the extent that not all Algonquin Power & Utilities Corp corporate/shared service costs were charged down to subsidiaries or affiliates (through direct assignment or indirect cost allocations) during the test year ending June 30, 2017, please: a. Discuss each event/transaction for which costs were retained at the Algonquin Power & Utilities Corp level b. State/discuss the reasons why the cost of such event/transaction was retained c. Provide the total cost retained by event/transaction DR requested by Jim Dittmer (jdittmer@utilitech.net).

Due Date 12/28/2017

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Security Public
Rationale NA

Missouri Public Service CommissionData Request

Data Request No.	0146
Company Name	Liberty Utilities (Midstates Natural Gas) Corp.-Investor(Gas)
Case/Tracking No.	GR-2018-0013
Date Requested	12/8/2017
Issue	Expense - Allocations
Requested From	Angela Cloven
Requested By	Marcella Forck
Brief Description	Acquisitions

Description	Please provide the following for each utility and utility asset acquired by Algonquin Power & Utilities Corp or any subsidiary of Algonquin Power & Utilities Corp for the period January 2015 to date. This request seeks information surrounding acquisitions of regulated and unregulated utilities and utility assets. This request only seeks information regarding utility assets not acquired to replace existing utility assets serving existing customers and/or acquired to serve an expanding but existing customer base. a. List and describe each acquisition noting its physical location, and as applicable, the regulatory jurisdiction wherein such utility/utility asset provides service b. Total cost of each acquisition c. Closing date of each acquisition d. Total costs incurred in researching, negotiating and closing the purchase – delineating total internal loaded labor cost versus external costs incurred. e. A breakout of total internal loaded labor costs by officer/employee, noting the name, title and Algonquin Power & Utilities Corp subsidiary or business unit where each officer/employee is employed f. The ultimate accounting for all costs incurred in researching, negotiating and closing the purchase, noting balance sheet and income statement accounts charged by company/subsidiary/affiliate/business unit as may be applicable DR requested by Jim Dittmer (jdittmer@utilitech.net).
Due Date	12/28/2017

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**Security
Rationale**

**Public
NA**

Missouri Public Service Commission**Data Request**

Data Request No. 0154
Company Name Liberty Utilities (Midstates Natural Gas) Corp.-Investor(Gas)
Case/Tracking No. GR-2018-0013
Date Requested 12/8/2017
Issue Expense - Allocations
Requested From Angela Cloven
Requested By Marcella Forck
Brief Description Monthly, Quarterly Annual Budget Variances LUC Business Services and Corporate Services Costs

Description Please provide any annual budget variance reports that may have been prepared for calendar years 2015 and 2016 for LUC Business Services and/or Corporate Services costs, as well as any monthly or quarterly budget variance reports that may have been prepared for LUC Business Services and/or Corporate Services costs for the period July 2016 to date. Please continue to update this response as additional months of data becomes available throughout the discovery stage of this proceeding. DR requested by Jim Dittmer (jdittmer@utilitech.net).

Due Date 12/28/2017

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If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Liberty Utilities (Midstates Natural Gas) Corp.-Investor(Gas) office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to Liberty Utilities (Midstates Natural Gas) Corp.-Investor(Gas) and its employees, contractors, agents or others employed by or acting in its behalf.

Security Public
Rationale NA

Missouri Public Service Commission**Data Request**

Data Request No. 0155
Company Name Liberty Utilities (Midstates Natural Gas) Corp.-Investor(Gas)
Case/Tracking No. GR-2018-0013
Date Requested 12/8/2017
Issue Expense - Allocations
Requested From Angela Cloven
Requested By Marcella Forck
Brief Description LUC budgeted costs CAM Table 4a and 4b

Description Please provide budgeted 2016, 2017 and 2018 (when available) LUC costs by Type of Cost categories delineated within CAM Table 4a: Summary of Corporate Allocation Method of LUC Business Services Indirect Costs and Table 4b: Summary of Corporate Allocation Method of LUC Corporate Services Indirect Costs. DR requested by Jim Dittmer (jdittmer@utilitech.net).
Due Date 12/28/2017

The attached information provided to Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. GR-2018-0013 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Liberty Utilities (Midstates Natural Gas) Corp.-Investor(Gas) office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to Liberty Utilities (Midstates Natural Gas) Corp.-Investor(Gas) and its employees, contractors, agents or others employed by or acting in its behalf.

Security Public
Rationale NA

Missouri Public Service Commission**Data Request**

Data Request No. 0159
Company Name Liberty Utilities (Midstates Natural Gas) Corp.-Investor(Gas)
Case/Tracking No. GR-2018-0013
Date Requested 12/8/2017
Issue Expense - Allocations
Requested From Angela Cloven
Requested By Marcella Forck
Brief Description Cost retention at LUC level

Description To the extent that not all LUC Business Services or Corporate Services costs were charged down to subsidiaries or affiliates (through direct assignment or indirect cost allocations) during the test year ending June 30, 2017, please: a. Discuss each event/transaction for which costs were retained at the LUC level b. State/discuss the reasons why the cost of such event/transaction was retained Provide the total cost retained by event/transaction DR requested by Jim Dittmer (jdittmer@utilitech.net).
Due Date 12/28/2017

The attached information provided to Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. GR-2018-0013 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Liberty Utilities (Midstates Natural Gas) Corp.-Investor(Gas) office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to Liberty Utilities (Midstates Natural Gas) Corp.-Investor(Gas) and its employees, contractors, agents or others employed by or acting in its behalf.

Security Public
Rationale NA

Missouri Public Service Commission

Data Request

Data Request No.	0172
Company Name	Liberty Utilities (Midstates Natural Gas) Corp.-Investor(Gas)
Case/Tracking No.	GR-2018-0013
Date Requested	12/12/2017
Issue	Expense - Allocations
Requested From	Angela Cloven
Requested By	Marcella Forck
Brief Description	Monthly, Quarterly, Annual Budget Variances LUSC Shared Services Costs
Description	Please provide any annual budget variance reports that may have been prepared for calendar years 2015 and 2016 for LUSC Shared Services costs, as well as any monthly or quarterly budget variance reports that may have been prepared for LUSC Shared Services costs for the period July 2016 to date. Please continue to update this response as additional months of data becomes available throughout the discovery stage of this proceeding. DR requested by Jim Dittmer jdittmer@utilitech.net .
Due Date	1/1/2018

The attached information provided to Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. GR-2018-0013 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

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Security	Public
Rationale	NA

Missouri Public Service Commission**Data Request**

Data Request No.	0173
Company Name	Liberty Utilities (Midstates Natural Gas) Corp.-Investor(Gas)
Case/Tracking No.	GR-2018-0013
Date Requested	12/12/2017
Issue	Expense - Allocations
Requested From	Angela Cloven
Requested By	Marcella Forck
Brief Description	LUSC budgeted costs LUSC CAM table 5
Description	Please provide budgeted 2016, 2017, and 2018 (when available) LUSC costs by categories delineated within CAM Table 5 – List of Shared Services provided by Liberty Utilities Service Corp. DR requested by Jim Dittmer jdittmer@utilitech.net.
Due Date	1/1/2018

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Security	Public
Rationale	NA

Missouri Public Service Commission**Data Request**

Data Request No. 0177
Company Name Liberty Utilities (Midstates Natural Gas) Corp.-Investor(Gas)
Case/Tracking No. GR-2018-0013
Date Requested 12/12/2017
Issue Expense - Allocations
Requested From Angela Cloven
Requested By Marcella Forck
Brief Description Cost Retention at LUSC level

Description To the extent that not all LUSC Shared Services costs were charged down to subsidiaries or affiliates (through direct assignment or indirect cost allocations) during the test year ending June 30, 2017, please: a. Discuss each event/transaction for which costs were retained at the LUSC level b. State/discuss the reasons why the cost of such event/transaction was retained Provide the total cost retained by event/transaction. DR requested by Jim Dittmer jdittmer@utilitech.net.

Due Date 1/1/2018

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Security Public
Rationale NA