

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

In the Matter of Liberty Utilities (Midstates)
Natural Gas) Corp. for Authority to Issue) File No. _____
Long Term Unsecured Debt)

MOTION FOR PROTECTIVE ORDER

COMES NOW Liberty Utilities (Midstates Natural Gas) Corp. (hereinafter "Applicant") pursuant to 4 CSR 240-2.135(3)(A) and for its motion for a protective order by the Missouri Public Service Commission (hereinafter "Commission"), states the following:

1. Simultaneously herewith, Applicant has caused to be filed an Application and Request for Waivers requesting that the Commission issue an order authorizing Applicant to issue long-term, unsecured indebtedness for the purposes described therein. Applicant is an indirect subsidiary of Algonquin Power & Utilities Corp ("Algonquin").

2. Algonquin is a Securities Exchange Commission ("SEC") registrant. Its subsidiaries, including Applicant, are not so registered. In its filings with the SEC, Algonquin does not provide the level of detail that would be provided to the marketplace by full disclosure of the contents of the Application, nor has the information otherwise been made a matter of public record. Therefore, Applicant is required to seek confidential treatment of the information redacted from the Application in order to comply with the rules of the SEC.

WHEREFORE, Applicant requests that the Commission issue its Protective Order in this case finding that it is appropriate for the information redacted from the public version of the Application to be designated as highly confidential for good cause shown,

that the information shall retain its preliminary designation as highly confidential in the Commission's electronic filing and information system (EFIS) and for such other orders or relief as may be appropriate in the circumstances.

Respectfully submitted,

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**Attorneys for Liberty Utilities
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was electronically transmitted, on this 3rd day of October, 2017, to:

Office of the General Counsel
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