

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

In the Matter of Liberty Utilities (Midstates)
Natural Gas) Corp.'s Fuel Costs Related to the) Case No. GU-2021-0276
Extraordinary Weather Event of February 2021)

RESPONSE TO COMMISSION ORDER

COMES NOW Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty and submits this Response to Commission Order regarding the November 17, 2021, *Order Directing Response*. In this regard, Liberty respectfully states as follows to the Missouri Public Service Commission (the “Commission”):

1. In this docket, Liberty filed an application seeking an Accounting Authority Order (“AAO”) regarding costs incurred during the extreme weather event of February 2021 (“Storm Uri”). On November 16, 2021, the Staff of the Commission (“Staff”) filed its *Staff Recommendation* and *Memorandum* recommending that the Commission deny Liberty’s request for an AAO.

2. Through a separate docket and tariff filing, Liberty sought and obtained approval to revise its Purchased Gas Adjustment (“PGA”)/Actual Cost Adjustment (“ACA”) tariff provisions. Liberty then submitted its PGA/ACA filing on November 4, 2021, along with verified direct testimony seeking to extend the recovery periods for the extraordinary Storm Uri costs (Case No. GR-2022-0128, Tracking No. JG-2022-0148). Liberty’s revised tariff and the Commission’s *Order Approving PGA Tariff and Approving Extended Recovery Period* are set to take effect December 1, 2021.

3. The goal of all of these proceedings is the deferral of certain costs that would otherwise be due from Liberty's retail customers over a 12-month period under the traditional PGA/ACA tariff process.

4. Liberty agrees with Staff that the requested Storm Uri AAO will not be needed so long as Liberty's revised PGA/ACA tariff, with the extended recovery periods for Liberty's Storm Uri costs, and the Commission's *Order Approving PGA Tariff and Approving Extended Recovery Period* take effect December 1, 2021. Liberty, however, requests that this docket remain open until the revised PGA/ACA tariff and the Commission's order approving the same take effect.

WHEREFORE, Liberty submits this Response to Commission Order and seeks such relief as is just and proper under the circumstances.

Respectfully submitted,

/s/ Diana C. Carter

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Certificate of Service

I hereby certify that the above document was filed in EFIS on this 29th day of November, 2021, and also sent by electronic transmission to all counsel of record.

/s/ Diana C. Carter