

*Exhibit No.:*  
*Issue(s):* Revenues  
*Witness:* Marina Stever  
*Sponsoring Party:* MoPSC Staff  
*Type of Exhibit:* Rebuttal Testimony  
*Case No.:* GR-2024-0106  
*Date Testimony Prepared:* August 22, 2024

**MISSOURI PUBLIC SERVICE COMMISSION**  
**INDUSTRY ANALYSIS DIVISION**  
**TARIFF/RATE DESIGN DEPARTMENT**

**REBUTTAL TESTIMONY**  
**OF**  
**MARINA STEVER**

**LIBERTY UTILITIES (Midstates Natural Gas) CORP.,**  
**d/b/a Liberty**

**CASE NO. GR-2024-0106**

*Jefferson City, Missouri*  
*August 22, 2024*

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**MARINA STEVER**

**LIBERTY UTILITIES (Midstates Natural Gas) CORP.,  
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1 **REBUTTAL TESTIMONY**

2 **OF**

3 **MARINA STEVER**

4 **LIBERTY UTILITIES (Midstates Natural Gas) CORP.,**

5 **d/b/a Liberty**

6 **CASE NO. GR-2024-0106**

7 Q. Please state your name and business address.

8 A. My name is Marina Stever, 200 Madison Street, Jefferson City, MO 65101.

9 Q. Are you the same Marina Stever that filed Direct Testimony in this case?

10 A. Yes.

11 Q. What is the purpose of your rebuttal testimony?

12 A. The purpose of my rebuttal testimony is to provide updated billed rate revenue  
13 adjustments for the residential, small general firm, medium general firm, large general firm,  
14 and interruptible rate classes for Liberty Utilities (Midstates Natural Gas) Corp., d/b/a Liberty  
15 (“Liberty Midstates”). Adjustments have been applied to the update period billing determinants  
16 of Liberty Midstates and will be the basis of Staff’s recommend rate designs.

17 Q. Through this testimony, do you provide any recommendations that should be  
18 specifically reflected in the Commission’s Report and Order in this case?

19 A. Yes, I recommend that the Commission Order reflect Staff’s updated adjusted  
20 rate revenue along with the billing determinants as provided in my testimony.

21 **RATE REVENUES AND BILLING DETERMINANTS**

22 Q. What rate classes did Staff normalize and annualize?

Rebuttal Testimony of  
Marina Stever

1           A.     Staff normalized and annualized billing determinants for the residential, small  
2 general firm (“SGF”), medium general firm (“MGF”), large general firm (“LGF”), and  
3 interruptible (“INT”) rate classes.<sup>1</sup>

4           Q.     What rate revenue adjustments did Staff make to the rate classes?

5           A.     Staff made the following adjustments to the rate classes:

- 6                   a.    Update period adjustments;
- 7                   b.    Rate switchers;
- 8                   c.    365 days adjustment;
- 9                   d.    Weather normalization; and
- 10                  e.    Customer growth

11          Q.     How did Staff calculate its update period adjustment?

12          A.     Initially, Staff requested the billing determinants for the update period from  
13 January 1, 2023, through December 31, 2023.<sup>2</sup> Staff then calculated the revenue for  
14 the 12 months ending December 31, 2023. The update period adjustment is the difference  
15 of billed usage and revenue through December 31, 2023, compared to the billed usage  
16 and revenue through the 12 months ending December 31, 2022. In Liberty Midstates’ initial  
17 response to Data Request (“DR”) 0209, the bill counts were identical for all districts and all rate  
18 classes provided November 2022 and November 2023, as well as December 2022 and  
19 December 2023. On July 18, 2024, Liberty Midstates provided corrected bill counts for those  
20 months that may have been affected by the implementation of their new billing system.<sup>3</sup>

21          Q.     Did Staff make an adjustment for customer growth?

22          A.     Yes, Staff did make an adjustment for customer growth after receiving the  
23 corrected bill counts for the update period. Additionally, on August 8<sup>th</sup>, Liberty Midstates

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<sup>1</sup> Staff witness Justin Tevie discusses the transportation class in his direct testimony.

<sup>2</sup> Data Request Response 0209.0, *Missouri Public Service Commission Data Request- 0209 CONFIDENTIAL.xlsx*.

<sup>3</sup> *Missouri Public Service Commission Data Request - 0209 REVISED CONFIDENTIAL.xlsx*.

1 provided additional bill counts and usage for all classes and all districts for January 2024 and  
2 February 2024.<sup>4</sup>

3 Gas customers often, but do not always, fluctuate seasonally over a 12-month period.  
4 Some customers leave the system during the spring and summer months and come back on the  
5 system during the fall and winter months. For this reason, Staff calculated a monthly customer  
6 growth factor for residential and small general firm customers that considers seasonal  
7 fluctuation. This customer growth factor is calculated by taking the bill count of the final month  
8 of each season from the data provided<sup>5</sup> and dividing that by the weather normalized monthly  
9 bill count. The customer growth factor for that month is then applied to the weather normalized  
10 monthly usage (Ccf).<sup>6</sup> For example, if the bill count in February 2024 is 100 and the weather  
11 normalized bill count for January 2023 is 99, then the customer growth factor for that month  
12 would be 1.0101. Furthermore, if the weather normalized usage in January 2023 is 200, then  
13 the customer growth adjusted usage would be 202.0202 Ccf. Since seasonality did not appear  
14 to be present in the other rate classes, Staff applied a customer growth factor that divides the  
15 February 2024 bill count by the monthly bill count. This customer growth factor was applied  
16 to the most previously adjusted usage. For example, if a class in a specific district did not need  
17 a weather normalization adjustment, then the customer growth factor would be applied to the  
18 update period usage for that particular district's class.

19 **CONCLUSION**

20 Q. What is your recommendation?

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<sup>4</sup> DR 0209 Midstates Consumption Jan – Feb 2024 CONFIDENTIAL

<sup>5</sup> October 2023 for summer and February 2024 for winter.

<sup>6</sup> Staff witness Hari K. Poudel, PhD provided the monthly weather normalization adjustment that also accounts for rate switchers and the 365-Days-Adjustment.

Rebuttal Testimony of  
Marina Stever

1           A.     I am recommending the Commission base its awarded revenue requirement and  
2 billing determinants on Staff's updated rate revenue adjustments and billing determinants as  
3 attached.<sup>7</sup>

4           Q.     Does this conclude your rebuttal testimony?

5           A.     Yes, it does

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<sup>7</sup> Schedule MS-r1-Confidential

**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

In the Matter of the Request of Liberty )  
Utilities (Midstates Natural Gas) Corp. ) Case No. GR-2024-0106  
d/b/a Liberty to Implement a General Rate )  
Increase for Natural Gas Service in the )  
Missouri Service Areas of the Company )

**AFFIDAVIT OF MARINA STEVER**

STATE OF MISSOURI )  
 ) ss.  
COUNTY OF COLE )

**COMES NOW MARINA STEVER** and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Rebuttal Testimony of Marina Stever*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

  
\_\_\_\_\_  
**MARINA STEVER**

**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 15<sup>th</sup> day of August 2024.

D. SUZIE MANKIN  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for Cole County  
My Commission Expires: April 04, 2025  
Commission Number: 12412070

  
\_\_\_\_\_  
Notary Public

**Case No. GR-2024-0106**

**SCHEDULE MS-r1**

**HAS BEEN DEEMED**

**CONFIDENTIAL**

**IN ITS ENTIRETY**