

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

In the Matter of an Investigation into)
Liberty Utilities (Midstates Natural)
Gas) Corp. Concerning a Natural Gas)
Incident in Jackson, Fruitland, and)
Gordonville, Missouri)

File No. GS-2026-XXXX

STAFF’S MOTION TO ESTABLISH A CASE

COMES NOW the Staff of the Missouri Public Service Commission (hereafter the “Staff” or Commission”), by and through counsel, and for its Motion to Establish a Case states as follows:

1. Pursuant to Section 386.310 of the Revised Statutes of Missouri (“RSMo”), the Commission has the authority to require every gas utility, including municipal gas systems, to operate its system in a manner that promotes and safeguards the health and safety of its employees, customers, and the public.

2. The Commission has jurisdiction to regulate gas pipeline safety under Section 386.310, RSMo.

3. A public utility that owns any gas plant is subject to the provisions of Section 386.572, RSMo., for violation of any law, order, decision, decree, rule, direction, demand, or requirement of the Commission. § 386.572, RSMo.

4. Liberty Utilities (Midstates Natural Gas) Corp. (“Liberty Midstates”) is a public utility under Section 386.020, RSMo.

5. Liberty Midstates owns and operates a gas plant and is subject to the provisions of Section 386.572, RSMo.

6. The monetary penalties for violations of such gas safety standards are set forth in Sections 386.572.2 and .3, RSMo, and are considered “separate and distinct

offenses, regardless of whether such violations relate to the same incident. In the case of a continuing violation, each day's continuance thereof shall be a separate and distinct offense."

7. On the morning of March 5, 2026, Liberty Midstates discovered signs of a gas leak on its natural gas distribution main supplying the gas distribution systems in Jackson, Fruitland and Gordonville, Missouri. The leak was on a segment of pipe in an area affected by flooding and could not be immediately accessed to evaluate the leak severity or to make a repair. Liberty Midstates shut off the flow of gas to this main and began closing the gas service line valves to each of the approximately 7,000 customers in this service area. Due to the estimated volume of natural gas lost, Liberty Midstates determined this to be a federally reportable incident,¹ and notified the National Response Center ("NRC") and the Missouri Public Service Commission Safety Engineering Department Staff ("Staff").

8. Between March 5 and March 7, 2026, Liberty Midstates continued to close valves on customer service lines while working to construct and install a segment of replacement pipeline. Liberty Midstates brought in a portable natural gas supply and after all service line valves had been closed on March 8, 2026, Liberty Midstates began reintroducing gas into the distribution system and restoring service to customers. By March 10, 2026, a replacement segment of main had been installed, pressure tested and tied into the system. Restoration of service to individual customers continued through March 13, 2026.

¹ Incident reporting requirements are in Commission Rule 20 CSR 4240-40.020 (3) and (4).

9. A Staff member visited the incident location on March 5, 10 and 11, 2026, to view the area in which the gas release occurred and damage to the pipeline, and review aspects of the emergency response efforts. Staff intends to further investigate Liberty Midstates' procedures and actions for compliance with applicable Commission rules pertaining to protection of pipelines from hazards,² patrols,³ continuing surveillance,⁴ and emergency response.⁵

10. As a result of this incident, Staff recommends the Commission establish a case for purposes of receiving a report resulting from the investigation of the incident by the Commission's Safety Engineering Department.

11. Staff further recommends the Commission direct that the investigation report, or status report, be filed by September 30, 2026.

WHEREFORE, for the reasons set forth above, Staff respectfully requests the Commission establish a case for the purpose of receiving an investigation report, or status report, as described herein no later than September 30, 2026, and for any other such orders and relief as it deems just and appropriate under the circumstances.

² Commission Rule 20 CSR 4240-40.030(7)(I)1. requires each operator to take all practicable steps to protect each transmission line or main from washouts, floods, unstable soil, landslides or other hazards that may cause the pipeline to move or to sustain abnormal loads.

³ Commission Rule 20 CSR 4240-40.030(13)(L) requires operators to patrol mains in places where anticipated physical movement or external loading could cause failure or leakage.

⁴ Commission Rule 20 CSR 4240-40.030(12)(H) requires operators to perform continuing surveillance of their facilities.

⁵ Commission Rule 20 CSR 4240-40.030(12)(J) requires operators to establish written procedures to minimize the hazard resulting from a gas pipeline emergency.

Respectfully submitted,

/s/ J. Scott Stacey

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**ATTORNEY FOR STAFF OF THE
PUBLIC SERVICE COMMISSION**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record this 16th day of March, 2026.

/s/ J. Scott Stacey