

**March 04, 2016**

**IOWA UTILITIES BOARD**

STATE OF IOWA  
DEPARTMENT OF COMMERCE  
BEFORE THE IOWA UTILITIES BOARD

IN RE:

LIBERTY UTILITIES (MIDSTATES  
NATURAL GAS) CORP. d/b/a LIBERTY  
UTILITIES

DOCKET NOS. WRU-2016-0004-0222  
& EEP-2016-0002

**OFFICE OF CONSUMER ADVOCATE RESPONSE**

The Office of Consumer Advocate (OCA), a division of the Iowa Department of Justice, responds as follows to the Request for Waiver of 199 IAC 35.4(4), 199 IAC 35.8(2)(d), and 199 IAC 35.10 filed by Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Utilities (Liberty Utilities) on or about February 19, 2016:

OCA concurs with the rationale for Liberty Utilities' waiver request and its assertion that the allowance of its waiver request is consistent with factors guiding such decision under 199 IAC 1.3 and 35.7. A plan period less than five years, as Liberty proposes, will allow Liberty Utilities to better align its next energy efficiency plan with the energy efficiency processes of other rate-regulated gas and electric utilities in Iowa. Accordingly, OCA has no objection to Liberty Utilities' Request for Waiver.

Respectfully submitted,

Mark R. Schuling  
Consumer Advocate

/s/ Jennifer C. Easler

Jennifer C. Easler

Attorney

1375 East Court Avenue

Des Moines, IA 50319-0063

Telephone: (515) 725-7200

E-mail: [IowaOCA@oca.iowa.gov](mailto:IowaOCA@oca.iowa.gov)

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