

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

In the Matter of the Tariff Filing of The Empire)
District Electric Company to Implement a General) Case No. ER-2006-0315
Rate Increase for Retail Electric Service Provided)
to Customers in its Missouri Service Area.)

JOINT STATEMENT OF CONCURRENCE REGARDING TEST YEAR AND UPDATE PERIOD

COME NOW The Staff (“Staff”) of the Missouri Public Service Commission (“Commission”), the Office of the Public Counsel (“Public Counsel”), Praxair, Inc. (“Praxair”), Explorer Pipeline Company (“Explorer”) Kansas City Power & Light Company (“KCPL”), Aquila, Inc. (“Aquila”) and the Missouri Department of Natural Resources (“DNR”), and respectfully state as follows:

1. On February 1, 2006, The Empire District Electric Company (“Empire” or “Company”) filed with the Commission proposed tariff sheets bearing an effective date of March 3, 2006, which are designed to produce a gross annual revenue increase of \$29,513,713 for electric service provided to retail customers in Empire’s Missouri service area.

2. On February 7, 2006, the Commission issued its Suspension Order And Notice, Order Setting Hearings, and Order Directing Filing. Among other things, the Commission directed that Empire file by February 21, 2006 its recommendation regarding the proper test year, and that Empire “must file any request for a true-up audit and hearing in a separate pleading, concurrent with its test year recommendation.” The Commission further directed the Staff, Public Counsel, and any persons or entities requesting intervention to file by March 7, 2006: a) a pleading either indicating concurrence with Empire’s recommended test year or recommending alternatives thereto; and b) a separate pleading concerning their recommendation regarding a true-up.

3. Applications to intervene were filed by KCPL and by Praxair and Explorer¹ on February 24, 2006; by Aquila on February 27, 2006; and by DNR on March 2, 2006. The Commission has yet to rule on these applications.

4. On February 17, 2006, Empire timely filed its Recommendation For Proper Test Year, wherein the Company recommended that the Commission establish the twelve months ended December 31, 2005 as the test year in this proceeding, with an update period for known and measurable changes through March 31, 2006. Empire did not file a pleading recommending a true-up audit and hearing in this case.

5. The undersigned hereby state that they concur in Empire's recommendation that the Commission establish the twelve months ended December 31, 2005 as the test year in this proceeding, with an update period for known and measurable changes through March 31, 2006.

¹ The joint application of Praxair and Explorer was provisional in light of the Commission's approval of the Stipulation And Agreement in Case No. EO-2005-0263 ("Agreement"), which provided that these companies, as signatories to that Agreement, "shall be considered as having sought intervenor status in any rate case or rate filings without the necessity of filing an application to intervene and Empire consents in advance to such interventions."

Respectfully submitted,

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronic mail to all counsel of record this 7th day of March 2006.

/s/ Dennis L. Frey _____