

In the Matter of a Working Case to Draft a)
Rule Regarding Utility Pay Stations and) File No. AW-2014-0329
Loan Companies)

COME NOW The Empire District Electric Company and The Empire District Gas Company (“Empire” or “Company”), by and through counsel, and respectfully state as follows with regard to the *Notice of Opportunity to Comment About the Fiscal Impact of Rule* issued herein by the Missouri Public Service Commission (“Commission”) on September 11, 2014:

1. The Order states that the Commission is providing stakeholders an opportunity to describe the fiscal impact of the Commission’s proposed rule.
2. Empire believes the proposed rule, if adopted, will have a fiscal impact on the Company. At this time, however, Empire is unable to state with particularity the fiscal impact of the proposed rule.
3. If a rule is adopted on this subject, Empire will need to track and determine the financial burden of determining if the Company’s authorized pay agents and potential pay agents offer short-term loans – either directly or through a subsidiary, parent, or other affiliate. Empire may also need to track and determine the financial burden of continuing to “police” the Company’s authorized pay agents to determine if any authorized pay agent begins to offer short-term loans – either directly or through a subsidiary, parent, or other affiliate, after the pay agent relationship is initially established.

4. Depending on the meaning of “or authorized pay agent relationship,” Empire may also need to track and determine the financial burden of determining the source of payments received on behalf of customers, in order to determine if the payments are coming from a short-term lending entity and if that short-term lending entity is advertising to the public that it accepts utility payments (even in the absence of a contractual relationship with the utility).

WHEREFORE, Empire respectfully submits these fiscal impact comments for the Commission’s consideration. Empire requests such relief as is just and proper under the circumstances.

Respectfully submitted,

/s/ Diana C. Carter

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ATTORNEYS FOR EMPIRE

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of September, 2014, I electronically filed the foregoing with the Commission using the EFIS system which sent notification of such filing to all counsel of record in this matter.

/s/ Diana C. Carter