

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

In the Matter of the Application of The Empire )  
District Electric Company and The Empire )  
District Gas Company for Approval of their ) **Case No. AO-2012-0062**  
Cost Allocation Manual )

**STAFF’S APRIL 2016 STATUS REPORT AND MOTION TO LATE-FILE**

**COMES NOW**, the Staff of the Missouri Public Service Commission (“Staff”), and  
for its *April 2016 Status Report* states as follows:

1. In its *March 2016 Status Report* the Staff reported that The Empire District Electric/Gas Company (“Empire”) had indicated to the Staff that due to its pending general rate increase case (File No. ER-2016-0023) and merger case (File No. EM-2016-0213) with Liberty Utilities (Central) Co. and Liberty Sub Corp., it will take awhile for Empire to get back with the Staff regarding the draft cost allocation manual (“CAM”) that the Staff had previously submitted to Empire and the Office of the Public Counsel (“Public Counsel”) and Public Counsel.

2. On April 1, 2016 in Empire’s general rate increase case, File No. ER-2016-0023, Public Counsel witness Charles R. Hyneman filed Direct Testimony and, as Schedule CRH-1, a proposed Cost Allocation Manual.

3. On April 25, 2016, Empire filed a *Motion To Strike CAM Testimony and Motion For Expedited Treatment*. Empire seeks that discussion of Empire’s CAM(s) take place in File No. AO-2012-0062.

4. On April 26, 2016 the Commission issued an *Order Setting Deadline For Filing Responses To Motion To Strike CAM Testimony*; the deadline set was 2:00 p.m., April 28, 2016.

5. On April 28, 2016, Public Counsel responded to Empires' *Motion To Strike CAM Testimony and Motion For Expedited Treatment* by filing a response requesting that the Commission deny Empire's *Motion To Strike CAM Testimony*.

6. On April 29, 2016, the Staff filed *Staff's Reply To OPC's Response To Empire's Motion To Strike* praying that the Commission grant Empire's *Motion To Strike CAM Testimony* and direct Public Counsel to file Mr. Hyneman's testimony and its proposed CAM in File No. AO-2012-0062.

7. Undersigned Staff counsel requests leave of the Commission to file this status report late due to other pressing Commission business. Undersigned Staff counsel apologizes for any inconvenience caused to the Commission or others by the delay.

**WHEREFORE**, the Staff submits its *April 2016 Status Report*.

Respectfully submitted,

**/s/ Steven Dottheim**

Steven Dottheim  
Chief Deputy Staff Counsel  
Missouri Bar No. 29149  
Attorney for the Staff of the  
Missouri Public Service Commission  
P.O Box 360  
Jefferson City, Missouri 65102  
Phone: (573) 751-7489  
Fax: (573) 751-9285  
E-mail: [steve.dottheim@psc.mo.gov](mailto:steve.dottheim@psc.mo.gov)

### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing *Staff's April 2016 Status Report* have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 2<sup>nd</sup> day of May, 2016.

**/s/ Steven Dottheim**