

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

In the Matter of The Empire District Gas)
Company's Fuel Costs Related to the) Case No. GU-2021-0275
Extraordinary Weather Event of February 2021)

NOTICE

COMES NOW The Empire District Gas Company (“EDG” or “Company”), and for this Notice regarding its intended actions with respect to fuel cost recovery and the extraordinary weather event that occurred in February of 2021 (“Winter Storm Uri”), respectfully states as follows to the Missouri Public Service Commission (the “Commission”):

1. EDG is submitting this Notice to inform the Commission, the Staff of the Commission, the Office of the Public Counsel, and other interested stakeholders that the Company will be requesting PGA/ACA tariff revisions in EDG's upcoming rate case (Docket No. GR-2021-0320) and will be requesting expedited implementation of those tariff revisions, as explained below.

2. Pursuant to Commission Rule 20 CSR 4240-4.017, EDG submitted a Notice of Intended Case Filing, initiating this docket, on February 26, 2021. At that time, EDG stated as follows:

Liberty intends to file an application requesting an Accounting Authority Order (“AAO”) and modification of its Purchased Gas Adjustment (“PGA”)/ Actual Cost Adjustment (“ACA”) tariff sheets. With its application, Liberty will seek an AAO to allow the Company to assist its customers by deferring certain costs that would otherwise be due in the near future under the Company’s current PGA/ACA tariff. An AAO and modification of the PGA/ACA tariff are necessary due to the unusually high fuel costs and resulting financing costs incurred by Liberty on behalf of its customers during the extraordinary weather event that occurred in February of 2021.

3. The Company remains committed to assisting its customers by deferring recovery of the unusually high fuel costs incurred by EDG on behalf of its customers during the extraordinary weather event, that would otherwise be due in the near future pursuant to EDG's current PGA/ACA

process. To accomplish this, modification of the PGA/ACA tariff – or an authorized variance from the tariff terms – will be necessary, although it appears that EDG will not need to seek an AAO regarding the Winter Storm Uri costs.

4. EDG submitted a Notice of Intended Case Filing regarding an upcoming general rate case, initiating Docket No. GR-2021-0320. EDG will make its general rate case filing in that docket shortly, with a proposed test year ending December 31, 2020, updated through September 30, 2021.

5. The upcoming general rate case will provide an appropriate venue for revising EDG's PGA/ACA tariff to address delayed cost recovery associated with Winter Storm Uri. Time will be of the essence, however, because EDG's next PGA/ACA filing will address a time period including Winter Storm Uri and must be made between October 15 and November 4, 2021. As such, EDG is submitting this Notice to inform stakeholders that the Company will be requesting PGA/ACA tariff revisions in EDG's upcoming rate case and will be requesting implementation of those tariff revisions in advance of EDG's next PGA/ACA filing.

6. With regard to deferring and delaying recovery of the unusually high fuel costs incurred by EDG on behalf of its customers during Winter Storm Uri, EDG will be requesting the addition of two provisions to its Purchased Gas Adjustment Clause tariff (Sheet Nos. 54-65):

Upon request by the Company and for good cause shown, the Commission may permit the Company to divide the cumulative balances of each System's excess or deficit gas cost recovery revenue by estimated sales volumes for an extended period.

If the Commission allows the Company to divide the cumulative balances of each System's excess or deficit gas cost recovery revenue by estimated sales volumes for an extended period, the carrying cost calculations shall be adjusted to allow a carrying cost that is reasonable given the length of the extended period.

7. As noted, EDG will be requesting approval of its revised PGA/ACA tariff sheets in the upcoming general rate case, with the revisions taking effect prior to the Company's next PGA/ACA filing. The length of the extended time period for collection of the Winter Storm Uri fuel costs and other related recovery terms will be proposed by EDG in its next PGA/ACA filing, to be made between October 15 and November 4, 2021. No action on behalf of the Commission is being requested in this docket.

WHEREFORE, Liberty submits to the Commission this Notice regarding its intended actions with respect to fuel cost recovery and the extraordinary weather event that occurred in February of 2021.

Respectfully submitted,

/s/ Diana C. Carter

Diana C. Carter MBE #50527

428 E. Capitol Ave., Suite 303

Jefferson City, Missouri 65101

Joplin Office Phone: (417) 626-5976

Cell Phone: (573) 289-1961

E-Mail: Diana.Carter@LibertyUtilities.com

Certificate of Service

I hereby certify that the above document was filed in EFIS on this 2nd day of August, 2021, with notification of the same being sent to all counsel of record. This Notice was also sent by electronic transmission to the Staff of the Commission and the Office of the Public Counsel.

/s/ Diana C. Carter