

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

Adam and Bridget Knight,)	
)	
Complainants,)	
)	
v.)	Case No. EC-2025-0088
)	
The Empire District Electric Company)	
d/b/a Liberty,)	
)	
Respondent.)	

ANSWER TO COMPLAINT

COMES NOW The Empire District Electric Company d/b/a Liberty (“Liberty” or the “Company”), and for its Answer to the Complaint of Adam and Bridget Knight (“Complainants”), Liberty respectfully states as follows to the Missouri Public Service Commission (the “Commission”):

1. On September 10, 2024, Complainants filed a complaint with the Commission, alleging an amount at issue of \$4,700.50 and stating an incident involving a failed secondary neutral connector at their residence located at 1638 K. Hill Rd., Clever, Missouri.

2. The Commission issued an *Amended Order Giving Notice of Case Filing, Directing an Answer, and Directing a Staff Investigation* on September 1, 2024, directing Liberty to file an answer herein by October 10, 2024.

3. Liberty admits the factual allegations contained in paragraphs 1-4 of the Complaint.

4. Without admitting any fault or liability, Liberty admits: Complainants suffered power surges on January 8, 2024, due to a failed component of the transformer (a secondary neutral connector) at the Complainants’ residence; and that damage may have occurred to some electrical and household items at the Complainants’ residence as a result.

5. Liberty denies Complainants' claims of failure to provide safe and reliable service and inadequate response to reported issues. Liberty responded to Complainants' first and only emergency call and made repairs that same day to ensure continued safe and reliable service for Complainants. Liberty denies all allegations of the Complaint not specifically admitted herein.

6. Liberty's Requirements for Residential Electric Service and Meter Installations states, in part, as follows:

3.1 Grounding

1. General

Unless otherwise noted, the Customer shall supply and install a 5/8" x 8' ground rod with ground rod clamp outside of the building wall. It shall be totally driven and be within two (2) feet of the structure at the meter socket location. If other grounding methods are used, all grounding systems must be bonded together as per NEC.

7. Liberty requires customers to have a ground rod at their metering point. Complainants carry the burden of protecting their property against potential damage, similar to that of what occurred on January 8, 2024.

WHEREFORE, Liberty respectfully requests that the Commission dismiss or deny the Complaint and grant such additional relief as is just and proper under the circumstances.

Respectfully submitted,

/s/ Diana C. Carter

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CERTIFICATE OF SERVICE

I hereby certify that the above document was filed in EFIS on this 10th day of October 2024, with notification of the same being sent to all counsel of record. This filing was also sent by electronic transmission and/or ordinary mail to all parties/counsel of record.

/s/ Diana C. Carter