

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

In the Matter of the Empire Electric)
Company d/b/a Liberty (Empire) Fuel Adjustment) **File No. EO-2025-0126**
(FAC) true-Up)

STAFF RECOMMENDATION TO APPROVE TRUE-UP FILING

COMES NOW, the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and for its Staff Recommendation to Approve True-Up Filing respectfully states:

1. On October 1, 2024,¹ Empire Electric Company d/b/a Liberty (“Liberty” or “Company”) filed with the Missouri Public Service Commission (“Commission”) its true-up filing for Accumulation Period 30 (“AP30”), which includes the time period March 1, 2023, through August 31, 2023, followed by Recovery Period 30 (“RP30”), which includes the billing months from December 1, 2023, through May 31, 2024, under the provisions of its Fuel Adjustment Clause (“FAC”) tariff sheets and 20 CSR 4240-20.090(9). Liberty’s filing is supported by the direct testimony and supporting schedules of Monica K. Gloodt, Analyst in the Rates and Regulatory Affairs Depart for Liberty’s Central Region.

2. Commission Rule 20 CSR 4240-20.090(9)(D) requires the Commission’s Staff to examine and analyze the information Liberty has submitted. Commission Rule 20 CSR 4240-20.090 provides a 60-day timeline for resolution of these rate adjustment mechanism proceedings. The Commission ordered Staff to file its Report and Recommendation no later than October 31, 2024.

¹ All date references will be to 2024 unless otherwise stated.

3. As explained in Staff's Memorandum, attached hereto as Appendix A and incorporated herein by reference, Staff recommends the Commission approve Liberty's true-up filing.

4. The true-up amount of \$462,330 identified in Liberty's filing is the result of an under-collection of the Fuel and Purchased Power Adjustment ("FPA") for AP30 during RP30.

5. Staff reviewed and analyzed the direct testimony, supporting schedules and work papers of Liberty and witness Monica K. Gloodt. Staff also reviewed Liberty's monthly interest calculations. Staff agrees with the Company's filings.

6. Based on its examination and analysis of information Liberty filed and submitted in this case, Staff recommends the Commission approve Liberty's RP30 true-up filing for the billing months of December 1, 2023, through May 31, 2024, during which Liberty under-collected \$462,330 from its customers, for inclusion in the calculation of the FPA amount in Liberty's AP32 adjustment filing in file No. ER-2025-0125.

7. Staff verified that Liberty filed its 2023 annual report and is not delinquent on any assessment. Liberty is current on the submission of its Surveillance Monitoring reports, as required by 20 CSR 4240-20.090(6), and its monthly reports, as required by 20 CSR 4240-20.090(5). Staff is not aware of any other matter before the Commission that affects or is affected by this filing, except File No. ER-2025-0125, as noted herein.

WHEREFORE, Staff submits its analysis and recommends that the Commission approve Liberty's RP30 true-up filing for the billing months of December 1, 2023,

through May 31, 2024, with a total True-Up Amount for RP30 as set out in the body of this pleading.

Respectively Submitted,

/s/ Paul T. Graham

Paul T. Graham #30416
Senior Staff Counsel
P.O. Box 360
Jefferson City, Mo 65102-0360
(573) 522-8459
Paul.graham@psc.mo.gov

Attorneys for the Staff of the
Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 30th day of October, 2024.

/s/ Paul T. Graham

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. EO-2025-0126
The Empire District Electric Company, d/b/a Liberty (Empire)

FROM: Stacy Henderson, Senior Utility Regulatory Auditor

DATE: /s/ Stacy Henderson October 30, 2024
Energy Resources Department / Date

SUBJECT: Staff’s Analysis of and Recommendation Concerning The Empire District Electric Company, d/b/a Liberty (Empire) Thirtieth Fuel Adjustment Clause True-up Filing Under the Provisions in 20 CSR 4240-20.090(9).

DATE: October 30, 2024

On October 1, 2024, The Empire District Electric Company, d/b/a Liberty (hereafter “Liberty” or “Company”) filed with the Missouri Public Service Commission (“Commission”), in the form of direct testimony and supporting schedules of Liberty witness Monica K. Gloodt, its thirtieth true-up filing under the provisions of 20 CSR 4240-20.090(9).

Accumulation Period 30 (“AP30”) includes the time period March 1, 2023, through August 31, 2023, and is followed by Recovery Period 30 (“RP30”), which includes the billing months of December 1, 2023, through May 31, 2024. The true-up amount of \$462,330 identified in this filing is the result of an under-collection of the Fuel and Purchased Power Adjustment (“FPA”) amount for AP30 during RP30.

The true-up amount of \$462,330 for RP30 is included in the preliminary calculation of the Fuel and Purchased Power (“FPA”) amount included in Liberty’s Accumulation Period 32 (“AP32”) adjustment filing, also filed on October 1, 2024, in File No. ER-2025-0125, which Liberty filed in compliance with its FAC.¹

¹ The Empire District Electric Company’s P.S.C. Mo. No. 6, Section 4, 1st Revised Sheet No. 17p tariff sheet:

TRUE-UP OF FPA: In conjunction with an adjustment to its FAR, the Company will make a true-up filing with an adjustment to its FAC on the first Filing Date that occurs after completion of each Recovery Period. The true-up adjustment shall be the difference between the FPA revenues billed and the FPA revenues authorized for collection during the true-up recovery period, i.e. the true-up adjustment. Any true-up adjustments or refunds shall be reflected in item T above and shall include interest calculated as provided for in item I above.

The Commission Staff (“Staff”) examined the direct testimony of Liberty witness Monica K. Gloodt, the supporting schedules and work papers Liberty provided with its true-up filing in this case, and the monthly information Liberty has submitted to the Commission. Staff also reviewed and agrees with Liberty’s monthly interest calculations for RP30.

Based on its examination and analysis of information Liberty filed and submitted in this case, Staff recommends the Commission approve Liberty’s RP30 true-up filing for the billing months December 1, 2023 through May 31, 2024, during which Liberty under-collected \$462,330 from its customers for inclusion in the calculation of the FPA amount in Liberty’s AP32 adjustment filing in File No. ER-2025-0125.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

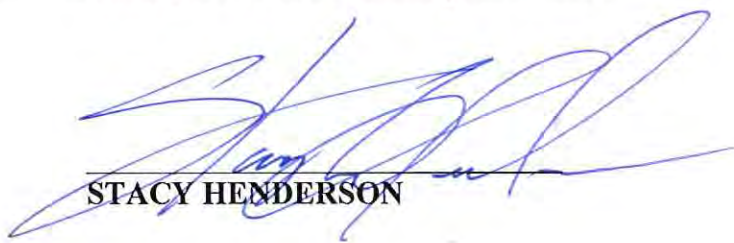
In the Matter of The Empire District Electric)
Company d/b/a Liberty (Empire) Fuel)
Adjustment Clause (FAC) True-Up) File No. EO-2025-0126

AFFIDAVIT OF STACY HENDERSON

STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

COMES NOW STACY HENDERSON and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation* in memorandum form; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.



STACY HENDERSON

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 28th day of October 2024.

D. SUZIE MANKIN Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: April 04, 2025 Commission Number: 12412070



Notary Public