

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

In the Matter of the Request of The Empire)
District Electric Company d/b/a Liberty for)
Authority to File Tariffs Increasing Rates)
for Electric Service Provided to Customers)
In its Missouri Service Area)

Case No. ER-2024-0261

**PUBLIC COUNSEL’S MOTION FOR AN ORDER DIRECTING LIBERTY
TO ISSUE A NEW PRESS RELEASE TO CORRECT ITS PRIOR PRESS RELEASE**

COMES NOW the Office of Public Counsel (“Public Counsel”) and, for its motion for a Commission order which directs Liberty to issue a new press release to correct its February 26, 2025, press release for its refiled case, states:

1. On November 6, 2024, Liberty filed tariff sheets accompanied by a press release (Schedule LP-2)¹ in which, among other things, it said, “If approved by regulators, new rates would cost the average Liberty Missouri residential electric customer using 1,000 kilowatt-hours of usage per month about \$31 per month.” Consistent with the foregoing, in Schedule LP-3 Liberty proposed an “exemplary notice” for use for local public hearings where, among other things, it said, “For a residential customer using 1,000 kilowatt-hours of electricity a month, Liberty’s proposed increase is approximately \$30.84 each month, or 19.15% percent.”

2. On February 26, 2025, Liberty withdrew its November 6, 2024, and February 3, 2025, tariff sheet filings, and filed new tariff sheets that were accompanied by a press release (Schedule LP-2-Final)² in which, among other things, it said, “If approved by regulators, the net bill impact as proposed by Liberty could cost the average Liberty Missouri residential electric customer using 1,000 kilowatt-hours of usage per month between \$33 and \$39 per month.” Liberty

¹ See also <https://central.libertyutilities.com/all/liberty-files-to-adjust-its-missouri-electric-rates-in-fall-of-2025.html>.

² See also <https://central.libertyutilities.com/all/missouri-electric-rate-update.html>.

also proposed a new “exemplary notice” for use for local public hearings (Schedule LP-3-Final). In that notice, among other things, Liberty said, “For a residential customer using 1,000 kilowatt-hours of electricity a month, Liberty’s proposed increase is approximately \$47.41 each month, or 31.05% percent.” As Public Counsel previously pointed out in paragraph 21 of its *Motion for Relief in Response to Liberty’s Refiled Case*, Liberty’s descriptions of the impact of its rate request on its Missouri residential customers stated in its press release—“between \$33 and \$39 per month”—is inconsistent with the impact it states in its exemplary notice—“approximately \$47.41 each month.”

3. As Public Counsel stated in its *Motion for Relief in Response to Liberty’s Refiled Case*, Public Counsel believes the “approximately \$47.41 each month” to be more accurate. The following table illustrates why Public Counsel has that belief:

	Summer Season		Winter Season	
	Current	Proposed	Current	Proposed
Customer Access Charge	\$13.00	\$16.00	\$13.00	\$16.00
The first 600-kWh, per kWh	\$84.186	\$118.644	\$84.186	\$118.644
Additional kWh, per kWh	\$56.124	\$67.348	\$46.604	\$55.924
Total general rate bill cost	\$153.3100	\$201.992	\$143.790	\$190.568
Increase		\$48.68		\$46.78

Wherefore, unless the Commission dismisses this case or orders Liberty to refile it based on a more current test year, the Office of Public Counsel moves the Commission to order Liberty to issue a new press release that corrects the press release that Liberty issued for its February 26, 2025, tariff filing, and order such other and further relief the Commission finds to be warranted under the circumstances.

Respectfully,

/s/ Nathan Williams

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 20th day of March 2025.

/s/ Nathan Williams