



February 26, 2025

VIA ELECTRONIC FILING

Ms. Nancy Dippell, Secretary
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

**RE: The Empire District Electric Company d/b/a Liberty
Case No. ER-2024-0261**

Dear Judge Dippell:

Liberty first initiated a general rate proceeding herein on November 6, 2024, by filing direct testimony and revised tariff sheets with a requested effective date thirty days after filing (Tracking No. JE-2025-0069). Those tariff sheets were designed to increase Liberty's base rate revenues by \$92,136,624. By Commission order issued November 14, 2024, those tariff sheets were suspended until October 5, 2025. On February 3, 2025, Liberty filed substitute tariff sheets in Tracking No. JE-2025-0069 to address an error in the initial filing. The substitute sheets were designed to increase Liberty's base rate revenues by \$152,855,209. On this date, Liberty has withdrawn all tariff sheets in Tracking No. JE-2025-0069.

At this time, I am providing to the Commission for filing, in electronic form, tariff sheets consisting of revised rate schedules which are designed, in total, to increase Liberty's gross annual electric base rate revenues by approximately \$152,825,837 million, exclusive of applicable gross receipts, sales, franchise, or occupational fees or taxes, or a 29.64% increase over current base rate electric service revenues. The specific tariff sheets being submitted are shown on the attached. All of these schedules bear a date of issue of February 26, 2025, and an effective date thirty days thereafter.

The Company requests that the Commission issue notice of this filing and allow for an additional intervention period in this docket. It is Liberty's intention to then work with the parties to propose a revised procedural schedule for the Commission's consideration.

Liberty is also submitting a Motion to Withdraw Direct Testimony (including MFRs) it filed on November 6 and December 20, 2024. At this time and in support of today's tariff filing, Liberty is submitting the direct testimonies (including MFRs) of the witnesses listed below. The testimonies are identical to those filed on November 6, 2024, and the five witnesses' direct testimony re-submitted on December 20, 2024, with the exception of limited changes to reflect



correction of the amount of the requested base rate revenue requirement increase and the presentation of the impact of rebasing the fuel and purchase power components for the following witnesses: Tim Lyons, Charlotte Emery, Leigha Palumbo, and Tim Wilson. Redlined versions and workpapers will be provided to the parties. The Company would note that witnesses Jill Schwartz and Dmitry Balashov are no longer employed by Liberty. Liberty is re-filing the direct testimonies of those witnesses, which will be adopted by current Liberty employees later in this proceeding.

Witness	Topic(s)
Dmitry Balashov	Study Updates, EV Program Update, Smart Grid Grant Update
Brian Berkstresser	Generation Investments
Daniel S. Dane	Capital Structure, ROE, Cost of Debt
Aaron J. Doll	FAC Transmission Inclusion, New Natural Gas Generation AAO
Shawn Eck	Cyber-Security Programs
Charlotte T. Emery	Revenue Requirement, Rate Base, Income and Expense Adjustments, Trackers, New Natural Gas Generator AAO
James A. Fallert	Pension, OPEB
Eric Fox	Weather Normalization
Nathaniel W. Hackney	Low-Income Programs
Candice Kelly	Customer Service/Billing
Timothy S. Lyons	CCOS, CWC
Michael McCuen	Excess ADIT
Leigha Palumbo	General Rate Case and FAC MFRs
Colin Penny	Customer First
John J. Reed	FAC Shareholder Split, FAC Transmission Inclusion
Shaen T. Rooney	Asbury Decommissioning
Jill Schwartz	CAM, Affiliate Allocations
Todd W. Tarter	Fuel Adjustment Base Factor
Jeffrey Westfall	Transmission and Distribution Investments
Timothy N. Wilson	Policy

Please note that portions of this filing have been designated as Confidential in accordance with Commission Rule 20 CSR 4240-2.135(2)(A) and Highly Confidential in accordance with Commission Rule 20 CSR 4240-2.135(4) and the protective order issued herein.

The Company also seeks continuation of its Fuel Adjustment Clause (“FAC”) with modifications. Included with this letter is a verification as required by 20 CSR 4240-22.080(18) and Section 393.1650(3), RSMo. With its direct filing, the Company proposes to rebase its net fuel and purchase power (“F&PP”) costs it recovered through its FAC during the test year and revenue recovered through its Energy Efficiency Cost Recovery “EECR” rate during the test year. This will reduce the net bill impact of the requested increase.



We appreciate the Commission's consideration of the Company's filing. Please do not hesitate to contact me with any questions or concerns regarding these filings.

Sincerely,

Diana Carter

Enclosures

cc: Service List

TARIFF SHEETS

MO P.S.C. Mo No. 6	Sec A	3rd Revised	Sheet No. 1	TOC
MO P.S.C. Mo No. 6	Sec 1	2nd Revised	Sheet No. 1	NS-RG
MO P.S.C. Mo No. 6	Sec 1	2nd Revised	Sheet No. 2	TC-RG
MO P.S.C. Mo No. 6	Sec 1	2nd Revised	Sheet No. 3	TP-RG
MO P.S.C. Mo No. 6	Sec 2	2nd Revised	Sheet No. 1	NS-GS
MO P.S.C. Mo No. 6	Sec 2	2nd Revised	Sheet No. 2	TC-GS
MO P.S.C. Mo No. 6	Sec 2	2nd Revised	Sheet No. 3	TP-GS
MO P.S.C. Mo No. 6	Sec 2	2nd Revised	Sheet No. 4	NS-LG
MO P.S.C. Mo No. 6	Sec 2	2nd Revised	Sheet No. 5	TC-LG
MO P.S.C. Mo No. 6	Sec 2	2nd Revised	Sheet No. 6	NS-SP
MO P.S.C. Mo No. 6	Sec 2	2nd Revised	Sheet No. 7	TC-SP
MO P.S.C. Mo No. 6	Sec 2	2nd Revised	Sheet No. 8	LP
MO P.S.C. Mo No. 6	Sec 2	2nd Revised	Sheet No. 9	TS
MO P.S.C. Mo No. 6	Sec 3	2nd Revised	Sheet No. 1	SPL
MO P.S.C. Mo No. 6	Sec 3	1st Revised	Sheet No. 1b	Reserved
MO P.S.C. Mo No. 6	Sec 3	1st Revised	Sheet No. 1c	Reserved
MO P.S.C. Mo No. 6	Sec 3	2nd Revised	Sheet No. 2	PL
MO P.S.C. Mo No. 6	Sec 3	2nd Revised	Sheet No. 3	LS
MO P.S.C. Mo No. 6	Sec 3	2nd Revised	Sheet No. 4	MS
MO P.S.C. Mo No. 6	Sec 3	1st Revised	Sheet No. 6	SPL-LED
MO P.S.C. Mo No. 6	Sec 3	2nd Revised	Sheet No. 10	RG-SCPP
MO P.S.C. Mo No. 6	Sec 3	2nd Revised	Sheet No. 11	RCPP
MO P.S.C. Mo No. 6	Sec 3	2nd Revised	Sheet No. 11a	RCPP
MO P.S.C. Mo No. 6	Sec 3	2nd Revised	Sheet No. 11b	RCPP
MO P.S.C. Mo No. 6	Sec 3	2nd Revised	Sheet No. 12	CEPP
MO P.S.C. Mo No. 6	Sec 3	2nd Revised	Sheet No. 12a	CEPP
MO P.S.C. Mo No. 6	Sec 3	2nd Revised	Sheet No. 12b	CEPP
MO P.S.C. Mo No. 6	Sec 3	2nd Revised	Sheet No. 12c	CEPP
MO P.S.C. Mo No. 6	Sec 3	2nd Revised	Sheet No. 13	ESBPP
MO P.S.C. Mo No. 6	Sec 3	2nd Revised	Sheet No. 13a	ESBPP
MO P.S.C. Mo No. 6	Sec 3	2nd Revised	Sheet No. 13b	ESBPP
MO P.S.C. Mo No. 6	Sec 4	1st Revised	Sheet No. 4	IR
MO P.S.C. Mo No. 6	Sec 4	1st Revised	Sheet No. 4b	IR
MO P.S.C. Mo No. 6	Sec 4	1st Revised	Sheet No. 5	BBP
MO P.S.C. Mo No. 6	Sec 4	5th Revised	Sheet No. 7a	REP
MO P.S.C. Mo No. 6	Sec 4	2nd Revised	Sheet No. 17i	FAC
MO P.S.C. Mo No. 6	Sec 4	2nd Revised	Sheet No. 17j	FAC
MO P.S.C. Mo No. 6	Sec 4	2nd Revised	Sheet No. 17k	FAC
MO P.S.C. Mo No. 6	Sec 4	2nd Revised	Sheet No. 17l	FAC
MO P.S.C. Mo No. 6	Sec 4	2nd Revised	Sheet No. 17m	FAC
MO P.S.C. Mo No. 6	Sec 4	2nd Revised	Sheet No. 17n	FAC



MO P.S.C. Mo No. 6	Sec 4	2nd Revised	Sheet No. 17o	FAC
MO P.S.C. Mo No. 6	Sec 4	2nd Revised	Sheet No. 17p	FAC
MO P.S.C. Mo No. 6	Sec 4	10th Revised	Sheet No. 17q	FAC
MO P.S.C. Mo No. 6	Sec 4	1st Revised	Sheet No. 18	OTOU
MO P.S.C. Mo No. 6	Sec 4	2nd Revised	Sheet No. 24	FRESH START PLAN
MO P.S.C. Mo No. 6	Sec 4	4th Revised	Sheet No. 25c	CSPP
MO P.S.C. Mo No. 6	Sec 5	1st Revised	Sheet No. 22	R & R
MO P.S.C. Mo No. 6	Sec 5	1st Revised	Sheet No. 23	Reserved