



The Empire District Electric Company d/b/a Liberty

Case No. ER-2024-0261

Office Public Counsel Data Request - 8001

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Response Date: 2024-12-26

Request No. 8001

Witness/Respondent: Leigha Palumbo

Submitted by: Lena Mantle, lena.mantle@opc.mo.gov

REQUEST:

Where in its prefiled direct case does Liberty explain or support its estimation “that rebasing energy costs in its FAC increases its annual gross revenues by \$41.8 million,” as stated in Direct Schedule LP-3 to the prefiled direct testimony of its witness Leigha Palumbo? If Liberty has not explained or supported its estimation “that rebasing energy costs in its FAC increases its annual gross revenues by \$41.8 million” in its prefiled direct case, please explain and support that estimation, and show how Liberty derived that \$41.8 million amount. Include workpapers with formulae intact, not hidden, and unlocked.

RESPONSE:

The \$41.8 million rebased energy amount is calculated by taking the difference between the eligible net fuel and purchased power costs (revenues/expenses) authorized in the last general rate case and comparing it to the proposed eligible net fuel and purchased power costs (revenues/expenses). The proposed eligible net fuel and purchased power cost details are found in Todd W. Tarter’s Direct Schedule TWT-2. The calculation to derive the \$41.8M utilizing the proposed eligible net fuel and purchased power costs is contained within the workpaper labeled: “Rebasing Energy Costs.xlsx.”

Energy Cost Type	ER-2021-0312 Base Fuel (1)	Direct Schedule TWT-2	Incremental Increase from ER-2021-0312
Total Energy Cost	\$44,171,698	\$85,924,986	\$41,753,288
NSI mwh	5,077,207	5,178,271	
FAC \$/MWh	\$ 8.70	\$ 16.59	

Footnotes:

(1) - Based on Agreed upon Fuel Base from Docket ER-2021-0312.