

In the Matter of a Working Case to Draft a )  
Rule Regarding Utility Pay Stations and ) File No. AW-2014-0329  
Loan Companies )

COME NOW The Empire District Electric Company and The Empire District Gas Company (“Empire”), by and through counsel, and respectfully state as follows with regard to the *Notice of Opportunity to Comment and Request for Responses* issued herein by the Missouri Public Service Commission (“Commission”) on May 27, 2014:

2. The Commission also provided that interested stakeholders could submit proposed rule language or comments by June 25, 2014, with regard to the possible drafting of a rule regarding utility pay stations and short-term lenders. In this regard, it is Empire's opinion that a rule on this topic is not required.

3. Empire utilizes a network of various businesses to serve as pay stations throughout its service territories. Although Empire does not currently utilize any short-term lenders as pay station agents, Empire prefers to maintain the flexibility to select its own pay station locations. Pay stations are for the convenience of Empire's customers and aid in the collection of utility payments, and Empire submits that each regulated utility should be able to exercise its own informed judgment and make these types of managerial decisions without unnecessary interference.

WHEREFORE, Empire respectfully submits these initial comments for the Commission's consideration. Empire requests such relief as is just and proper under the circumstances.

Respectfully submitted,

\_\_\_\_\_/s/ Diana C. Carter  
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ATTORNEYS FOR EMPIRE

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic transmission to all counsel of record on this 25<sup>th</sup> day of June, 2014.

\_\_\_\_\_/s/ Diana C. Carter