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Liberty Utilities
EMPIRE DISTRICT

FILED²

JUL 8 2019

**Missouri Public
Service Commission**

The Empire District Electric Company
a Liberty Utilities Company

Case No. AO-2018-0179

OPC Data Request - 1103

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Data Request Received: 05/22/19

Request No. 1103

Date of Response: June 11, 2019

Respondent: Mark Timpe

REQUEST:

What is the current "four factor" allocator for each expected eligible borrower to the LUCo utility Money Pool? Please provide the data used to develop each component of the four factor allocator for each expected eligible borrower, and the current four factor allocator for each expected eligible borrower in the LUCo utility Money Pool.

RESPONSE:

This response is provided subject to and without waiving the objections served on May 25, 2019.

See attached spreadsheet for the current four factor allocations and the data upon which they are based.

OPC Exhibit No. 13
Date 6/27/19 Reporter SA
File No. AO-2018-0179

	Customer Count		Labor Expense		Non Labor Expense		Net Plant	
	#	%	USD \$	%	USD \$	%	USD \$	%
Liberty Water [1]	81,990	11%	5,804,455	4%	19,458,778	8%	218,366,548	5%
Calpeco [2]	50,596	7%	8,462,850	5%	13,087,680	6%	373,593,767	9%
Granite State [3]	44,533	6%	10,529,300	7%	9,492,178	4%	167,677,582	4%
Energy North [4]	92,110	12%	24,203,277	15%	14,103,603	6%	456,652,687	11%
Midstates Gas [5]	82,372	11%	9,061,107	6%	9,648,435	4%	197,309,379	5%
Midstates Water [6]	3,722	0%	297,249	0%	1,459,448	1%	8,595,517	0%
Arkansas [7]	18,700	2%	2,056,730	2%	2,308,175	1%	36,730,496	1%
Woodson-Hensley [8]	447	0%	56,838	0%	162,158	0%	1,750,212	0%
Georgia [9]	62,697	8%	6,397,729	4%	9,292,763	4%	194,827,460	5%
New England Gas [10]	55,918	7%	15,066,546	10%	8,689,537	4%	173,888,313	4%
Whitehall - Water [11]	1,940	0%	183,136	0%	1,749,685	1%	3,007,221	0%
Whitehall - Sewer [12]	1,842	0%	203,162	0%	928,896	0%	3,432,642	0%
Park Water [13]	49,627	6%	8,344,195	5%	12,692,333	5%	214,922,334	5%
Empire [14]	221,013	29%	67,309,623	42%	134,826,509	57%	2,137,245,432	51%
Total	768,112	100%	158,475,167	100%	267,580,198	100%	4,187,859,590	100%

Liberty Water	40.00%	20.00%	20.00%	20.00%
Calpeco	40.00%	20.00%	20.00%	20.00%
Granite State	40.00%	20.00%	20.00%	20.00%
Energy North	40.00%	20.00%	20.00%	20.00%
Midstates Gas	40.00%	20.00%	20.00%	20.00%
Midstates Water	40.00%	20.00%	20.00%	20.00%
Arkansas	40.00%	20.00%	20.00%	20.00%
Woodson-Hensley	40.00%	20.00%	20.00%	20.00%
Georgia	40.00%	20.00%	20.00%	20.00%
New England Gas	40.00%	20.00%	20.00%	20.00%
Whitehall - Water	40.00%	20.00%	20.00%	20.00%
Whitehall - Sewer	40.00%	20.00%	20.00%	20.00%
Park Water	40.00%	20.00%	20.00%	20.00%
Empire	40.00%	20.00%	20.00%	20.00%

Summary	Total
Liberty Water [1]	7.68%
Calpeco [2]	6.59%
Granite State [3]	5.25%
Energy North [4]	11.22%
Midstates Gas [5]	7.18%
Midstates Water [6]	0.40%
Arkansas [7]	1.68%
Woodson-Hensley [8]	0.05%
Georgia [9]	5.79%
New England Gas [10]	6.38%
Whitehall - Water [11]	0.29%
Whitehall - Sewer [12]	0.22%
Park Water [13]	5.73%
Empire [14]	41.57%
Total	100.00%

Liberty Utilities (Della Vista Water) Corp.	0.88%
Liberty Utilities (Black Mountain Sewer) Corp.	0.34%
Liberty Utilities (Entrada Del Oro Sewer) Corp.	0.04%
Liberty Utilities (Gold Canyon Sewer) Corp.	0.56%
Liberty Utilities (Litchfield Park Water & Sewer) Corp.	3.88%
Liberty Utilities (Rio Rico Water & Sewer) Corp.	0.77%
Liberty Utilities (Silverleaf Water) LLC	0.50%
Liberty Utilities (Tall Timbers Sewer) Corp.	0.24%
Liberty Utilities (Woodmark Sewer) Corp.	0.31%
Liberty Utilities (Seaside Water) LLC	0.04%
Cordes Lakes Water Co.	0.12%
Liberty Utilities (Missouri Water) LLC	0.34%
Liberty Utilities (Fox River Water) LLC	0.06%
The Empire District Electric Company	39.15%
The Empire District Gas Company	1.92%
The Empire District Industries, Inc.	0.50%

Note: For services that benefit less than all of the listed companies, percentages will be re-calculated by excluding entities that do not benefit from the service.

- Liberty Water includes the water and wastewater operating assets located in Arizona and Texas.
- Calpeco refers to Liberty Utilities (CalPeco Electric) LLC which provides electric services in California.
- Granite State refers to Liberty Utilities (Granite State Electric) Corp. which provides electric services in New Hampshire. Granite State is a subsidiary of Liberty Energy Utilities (New Hampshire) Corp.
- Energy North refers to Liberty Utilities (Energy North Natural Gas) Corp. which provides natural gas services in New Hampshire. Energy North is a subsidiary of Liberty Energy Utilities (New Hampshire) Corp.
- Midstates Gas refers to Liberty Utilities (Midstates Natural Gas) Corp. which provides natural gas services in Missouri, Illinois and Iowa.
- Midstates Water refers to Liberty Utilities (Missouri Water) LLC and Liberty Utilities (Fox River Water) LLC which provides water and wastewater services in Missouri and Illinois.
- Arkansas refers to Liberty Utilities (Pine Bluff Water) Inc. which provides water services in Arkansas.
- Woodson-Hensley refers to Liberty Utilities (Woodson-Hensley Water) Corp. which provides water services in Arkansas.
- Georgia refers to Liberty Utilities (Peach State Natural Gas) Corp. which provides natural gas services in Georgia.
- New England Gas refers to Liberty Utilities (New England Natural Gas Company) Corp. which provides natural gas services in Massachusetts.
- [11], [12] Whitehall refers to Liberty Utilities (Whitehall Sewer) Corp. and Liberty Utilities (Whitehall Water) Corp. which provide water and wastewater services in Arkansas.
- Park Water refers to Liberty Utilities (Park Water) Corp. which provides water services in California.
- Empire refers to The Empire District Electric Company which provides electric services in Missouri, Arkansas, Kansas and Oklahoma, as well as natural gas, water, and wastewater services in Missouri. Also includes The Empire District Industries, Inc.