

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

In the Matter of the Tariff Filing of)	
Empire District Electric Company to)	
Implement a General Rate Increase for)	
Retail Electric Service to Customers in its)	Case No. ER-2004-0570
Missouri Service Area.)	

MOTION FOR CLARIFICATION

COMES NOW Staff of the Missouri Public Service Commission, and asks the Commission to clarify two aspects of its March 10, 2005 Report and Order in this case.

1. In its Report and Order issued January 11, 2005, in the remand of Case No. GR-99-315, the Commission directed “That Laclede Gas Company keep a separate accounting of its amounts accrued for recovery of its initial investment in plant from the amounts accrued for the cost of removal.” (Ordered paragraph 6) Staff asks that the Commission clarify that it intends for Empire District Electric Company keep its depreciation records in the same manner.

2. Staff asks the Commission to order Empire to use the depreciation rates in the attached Schedule 1. The Commission typically will include such a list in its Report and Order to insure that the parties clearly understand the rates to be booked by the Company. Staff has provided Schedule 1 to Empire District and to the Office of the Public Counsel. Counsel for Empire has indicated that Empire has no objections to Schedule 1; the Office of the Public Counsel has not yet responded.

WHEREFORE, the Staff respectfully asks the Commission to clarify its March 10 Report and Order in the above two matters.

Respectfully submitted,

DANA K. JOYCE
General Counsel

/s/ Thomas R. Schwarz, Jr.
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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or emailed to all counsel of record this 21st day of March, 2005.

/s/ Thomas R. Schwarz, Jr.

THE EMPIRE DISTRICT ELECTRIC COMPANY
Development of Annual Depreciation Rate Components

[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]	[9]	[10]
Account Number	Description	ALLOWANCE				Whole Life Rate %	ANNUAL ACCRUAL		
		ASL Years	Salvage %	COR %	Net Salvage %		Life Rate %	Salvage Rate %	COR Rate %
<u>STEAM PRODUCTION PLANT</u>									
<u>RIVERTON</u>									
311.00	Structures and Improvements	95.0			(0.10)	1.05	1.05		-
312.00	Boiler Plant Equipment	54.0			(0.30)	1.86	1.85		0.01
314.00	Turbogenerator Units	63.0			(0.27)	1.59	1.59		-
315.00	Accessory Electric Equipment	56.0			(0.09)	1.79	1.79		-
316.00	Miscellaneous Power Plant Equipment	51.0			0.10	1.96	1.96		-
<u>ASBURY</u>									
311.00	Structures and Improvements	95.0			(0.40)	1.06	1.05		0.01
312.00	Boiler Plant Equipment	54.0			(1.18)	1.87	1.85		0.02
312.70	Unit Train	15.0			-	6.67	6.67		-
314.00	Turbogenerator Units	63.0			(1.06)	1.60	1.59		0.01
315.00	Accessory Electric Equipment	56.0			(0.36)	1.79	1.79		-
316.00	Miscellaneous Power Plant Equipment	51.0			0.39	1.95	1.96	(0.01)	-
<u>IATAN</u>									
311.00	Structures and Improvements	95.0			(0.69)	1.06	1.05		0.01
312.00	Boiler Plant Equipment	54.0	0.40	2.42	(2.02)	1.89	1.85	(0.01)	0.05
314.00	Turbogenerator Units	63.0			(1.84)	1.62	1.59		0.03
315.00	Accessory Electric Equipment	56.0			(1.62)	1.81	1.79		0.02
316.00	Miscellaneous Power Plant Equipment	51.0			0.67	1.95	1.96	(0.01)	-
<u>HYDRAULIC PRODUCTION PLANT</u>									
<u>OZARK BEACH</u>									
331.00	Structures and Improvements	61.0			(1.14)	1.66	1.64		0.02
332.00	Reservoirs, Dams and Waterways	60.0			-	1.67	1.67		-
333.00	Waterwheels, Turbines and Generators	68.0			-	1.47	1.47		-
334.00	Accessory Electric Equipment	70.0			(1.14)	1.44	1.43		0.01
335.00	Miscellaneous Power Plant Equipment	41.0			-	2.44	2.44		-
<u>OTHER PRODUCTION PLANT</u>									
<u>RIVERTON CT</u>									
341.00	Structures and Improvements	55.0			-	1.82	1.82		-
342.00	Fuel Holders, Producers and Access.	26.0			-	3.85	3.85		-
343.00	Prime Movers	52.0			(0.05)	1.92	1.92		-
344.00	Generators	55.0			-	1.82	1.82		-
345.00	Accessory Electric Equipment	28.0			-	3.57	3.57		-
346.00	Miscellaneous Power Plant Equipment	25.0			0.04	4.00	4.00		-
<u>ENERGY CENTER CT</u>									
341.00	Structures and Improvements	55.0			-	1.82	1.82		-
342.00	Fuel Holders, Producers and Access.	26.0			-	3.85	3.85		-
343.00	Prime Movers	52.0			(0.06)	1.92	1.92		-
344.00	Generators	55.0			-	1.82	1.82		-
345.00	Accessory Electric Equipment	28.0			-	3.57	3.57		-
346.00	Miscellaneous Power Plant Equipment	25.0			0.06	4.00	4.00		-
Total Energy Center CT									
<u>ENERGY CENTER JET ENGINES</u>									
341.00	Structures and Improvements	55.0			-	1.82	1.82		-
344.00	Generators	55.0			-	1.82	1.82		-
345.00	Accessory Electric Equipment	28.0			-	3.57	3.57		-
346.00	Miscellaneous Power Plant Equipment	25.0			0.19	3.99	4.00	(0.01)	0.00
<u>STATE LINE CT</u>									
341.00	Structures and Improvements	55.0			-	1.82	1.82		-
342.00	Fuel Holders, Producers and Access.	26.0			-	3.85	3.85		-
343.00	Prime Movers	52.0			(0.12)	1.93	1.92		0.01
344.00	Generators	55.0			-	1.82	1.82		-
345.00	Accessory Electric Equipment	28.0			-	3.57	3.57		-
346.00	Miscellaneous Power Plant Equipment	25.0			0.16	3.99	4.00	(0.01)	0.00
<u>STATE LINE CC</u>									
341.00	Structures and Improvements	35.0			-	2.86	2.86		-
342.00	Fuel Holders, Producers and Access.	35.0			-	2.86	2.86		-

THE EMPIRE DISTRICT ELECTRIC COMPANY
Development of Annual Depreciation Rate Components

[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]	[9]	[10]
Account Number	Description	ALLOWANCE				Whole Life	ANNUAL ACCRUAL		
		ASL Years	Salvage %	COR %	Net Salvage %		Life Rate %	Salvage Rate %	COR Rate %
343.00	Prime Movers	35.0			(0.18)	2.86	2.86		-
344.00	Generators	35.0			-	2.86	2.86		-
345.00	Accessory Electric Equipment	35.0			-	2.86	2.86		-
346.00	Miscellaneous Power Plant Equipment	35.0			0.17	2.85	2.86	(0.01)	0.00
<u>TRANSMISSION PLANT</u>									
352.00	Structures & Improvements	55.0	-	15.00	(15.00)	2.09	1.82		0.27
353.00	Station Equipment	50.0	-	10.00	(10.00)	2.20	2.00		0.20
354.00	Towers & Fixtures	65.0	-	25.00	(25.00)	1.92	1.54		0.38
355.00	Poles & Fixtures	60.0	65.00	165.00	(100.00)	3.33	1.67	(1.08)	2.74
356.00	Overhead Conductors	65.0	60.00	100.00	(40.00)	2.15	1.54	(0.92)	1.53
<u>DISTRIBUTION PLANT</u>									
361.00	Structures & Improvements	60.0	-	25.00	(25.00)	2.08	1.67		0.41
362.00	Station Equipment	45.0	40.00	25.00	15.00	1.89	2.22	(0.89)	0.56
364.00	Poles, Towers & Fixtures	46.0	55.00	155.00	(100.00)	4.35	2.17	(1.20)	3.38
365.00	Overhead Conductors	53.0	50.00	150.00	(100.00)	3.77	1.89	(0.94)	2.82
366.00	Underground Conduit	37.0	10.00	55.00	(45.00)	3.92	2.70	(0.27)	1.49
367.00	Underground Conductors	32.0	5.00	20.00	(15.00)	3.59	3.13	(0.16)	0.62
368.00	Transformers	45.0	3.00	28.00	(25.00)	2.78	2.22	(0.07)	0.63
369.00	Services	40.0	20.00	120.00	(100.00)	5.00	2.50	(0.50)	3.00
370.00	Meters	44.0	-	-	-	2.27	2.27	-	-
371.00	Meter Installations	25.0	10.00	55.00	(45.00)	5.80	4.00	(0.40)	2.20
373.00	Street Lighting	48.0	25.00	75.00	(50.00)	3.13	2.08	(0.52)	1.57
<u>GENERAL PLANT</u>									
390.00	Structures & Improvements	40.0	-	10.00	(10.00)	2.75	2.50		0.25
391.10	Office Furniture and Equipment	20.0	-	-	-	5.00	5.00		-
391.20	Computer Equipment	10.0	-	-	-	10.00	10.00		-
392.00	Transportation Equipment	12.0	15.00	-	15.00	7.08	8.33	(1.25)	-
393.00	Stores Equipment	30.0	5.00	-	5.00	3.17	3.33	(0.16)	-
394.00	Tools, Shop & Garage Equipment	20.0	10.00	-	10.00	4.50	5.00	(0.50)	-
395.00	Laboratory Equipment	38.0	-	-	-	2.63	2.63		-
396.00	Power Operated Equipment	15.0	5.00	-	5.00	6.33	6.67	(0.34)	-
397.00	Communication Equipment	25.0	-	-	-	4.00	4.00		-
398.00	Miscellaneous Equipment	22.0	-	-	-	4.55	4.55		-