

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

In the Matter of The Empire District)	
Electric Company's Request for Authority)	
to File Tariffs Increasing Rates for Electric)	<u>Case No. ER-2019-0374</u>
Service Provided to Customers in its)	
Missouri Service Area)	

Public Counsel's Correction to Reply Brief

The paragraph immediately following the statement of Issue 8.a.—*Should any of Empire's management expenses not be included in Empire's revenue requirement?*—on page 25 of Public Counsel's reply brief does not reflect Public Counsel's discovery immediately before filing its reply brief of the disclaimer that Empire has not included the \$904 Bermuda trip expense in its cost-of-service Empire to which Ms. Richard testifies. Corrected, that paragraph follows:

Public Counsel agrees that its adjustment should be reduced by \$904.32 for the Bermuda trip, as Empire did not include that cost in its cost-of-service. Except for that \$904.32, Public Counsel's position has not changed from its initial brief. Yes. Empire's management expense includes meal costs for what Empire claims without support are business meetings in the amount of \$686,087. The disallowance of all other charges Public Counsel has deemed unreasonable or unjustifiable due to lack of justification of how these charges benefit Empire's retail customers is \$3,021,797 less \$904.32= \$3,020,892. Public Counsel's total test year disallowance of \$3,707,884 less \$904.32 = \$3,706,980 is recorded in account 923 for the test year.⁷⁰ Public Counsel also has a disallowance of \$3,006,362 (now less \$904.32) in account 923 for the true-up. Since Staff's account 923 number is based only

⁷⁰ Ex. 202, Public Counsel witness Amanda Conner, surrebuttal & true-up direct testimony, Sch. ACC-S-1.

on the test year, the amount that should be removed from account 923 in Staff's case after true-up is \$3,706,980.

Respectfully,

/s/ Nathan Williams

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 19th day of May 2020.

/s/ Nathan Williams