BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of The Empire District Electric Company d/b/a Liberty (Empire) for Authority to Implement Rate Adjustments Related to the Company's Fuel and Purchased Power Adjustment (FAC) Required in 20 CSR 4240-020.090	))))	**File No. ER-2021-0332** Tariff No. JE-2021-0178

STAFF RECOMMENDATION TO APPROVE TARIFF SHEET

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its recommendation states:

1. On April 1, 2021, The Empire District Electric Company d/b/a Liberty (Empire) (hereafter "Company" or "Empire") filed one proposed tariff sheet, bearing a proposed effective date of June 1, 2021, to revise its current period Fuel Adjustment Rates ("FARs") of its Fuel Adjustment Clause ("FAC"). This proposed tariff sheSec 4, 1st Revised Sheet No. 17q. The Commission assigned it Tariff Tracking No. JE-2021-0178.

2. Concurrently on April 1, 2021, Empire submitted a FAC true-up filing in File No. EO-2021-0333 to identify the true-up amount of $1,293,237 for the 23rd Recovery Period ("RP23") of its FAC. Although the true-up amount is included in line 8 of Empire's FPA amount in AP25, it was ultimately included in the total $168,720,211 extraordinary costs that Empire has requested to defer related to the February Storm Uri, and thus the true-up amount was not included in Empire's FPA amount on line 11.

3. For this Accumulation Period Empire's actual total energy costs eligible for the FAC were significantly higher than the base energy cost included in Empire's Missouri rates. Under normal circumstances, the Company would file a FAC rate tariff

that is designed to recover 95 percent of the energy cost differences, or approximately $167,436,489. However, the Company is seeking approval to defer $168,720,211 of what it states are extraordinary costs. This is pursuant to Commission Rule 20 CSR 4240-20.090(8)(A)2.AXI. Considering the deferral amount pertaining to the February Storm Uri extraordinary costs, the Company is proposing to use the remaining credit balance of $1,283,722 in the Accumulation Period to offset the under-recovery from its Missouri customers of the prior Recovery Period.

4. In addition to the Company's proposal to defer $168,720,211 of "extraordinary costs", in the testimony of Ms. Emery the Company has also proposed the Commission approve language in this preceding providing that Empire continues to have a reasonable expectation of recovery of these deferred costs. Empire is proposing that the portion of its fuel costs associated with February Storm Uri be treated in a different manner than would normally be afforded through the FAC mechanism. Staff agrees that the Storm Uri costs are "extraordinary" in nature, based both upon the applicable language in the FAC rule quoted above and the broad definition of "extraordinary costs" commonly used by the Commission in other accounting authority order deferral applications (i.e., costs are that unusual, unique and non-recurring). For this reason, Staff does not oppose Empire's proposal to defer Storm Uri costs to seek later recovery in rates. Empire's proposed deferral and requested language is discussed in greater detail in the accompanying Staff Memorandum.

5. In the accompanying Staff Memorandum, Staff recommends that the Commission issue an order approving Empire's proposed tariff sheet P.S.C. MO. No. 5,

Sec 4, 2nd Revised Sheet No. 17q, Canceling P.S.C. Mo. No 5, Sec 4, 1st Revised Sheet No. 17q, as requested by Empire, subject to true-up and prudence reviews.

6. The testimony and work papers include information that supports Empire's calculation of the dollar amount[1] used to calculate the FARs for Accumulation Period 25 ("AP25"). That dollar amount is $0[2] due primarily to the deferral the Company is seeking in this case.

7. Because of a difference in line losses, there are different FARs for service taken at secondary voltage level and at primary and above voltages levels. The resulting FARs are in the column marked "Proposed" in the following table:

Fuel Adjustment Rates ($ Per kWh)			
Service Voltage Level	Present	Proposed	Difference
Primary	$(0.00186)	$0.00000	$0.00186 Increase
Secondary (Residential)	$(0.00190)	$0.00000	$0.00190 Increase

8. Based on a monthly usage of 1,000 kWh, the proposed change to the FAR will increase the FAC of an Empire residential customer's bill from $(1.90) to $0.00, an increase of $1.90 per month.

9. Except for Empire's true-up filing in File No. EO-2021-0333, also filed April 1, 2021, Staff is not aware of any other matter pending before the Commission that affects or is affected by this tariff filing.

[1] The dollar amount used to calculate the Current Period FAR is called the Fuel and Purchased Power Adjustment ("FPA") which is located on line 11 of proposed 2nd Revised Sheet No. 17q.

[2] As footnote 3 explains in the proposed 2nd Revised Sheet No. 17q, "For this accumulation period only, the Fuel and Purchased Power Adjustment (FPA), on line 11, is calculated by taking the total of $167,436,489, on line 7, and reducing it by the extraordinary cost of $168,720,211, that the Company is seeking to defer, for a net of ($1,283,722). The True-up Amount of $1,293,237, on line 8, and the Interest Expense of ($9,515), on line 10, are added to the net of ($1,283,722). This brings the Total Fuel and Purchased Power Adjustment to $0."

10. The Staff's review shows Empire's filing is in compliance with Commission Rule 20 CSR 4240-20.090, §386.266 RSMo, and Empire's FAC embodied in its tariff.

11. Staff verified that Empire is not delinquent on any assessment and Empire filed its 2020 annual report. Empire is current on submission of its monthly reports, required by 20 CSR 4240-20.090(5), and its surveillance monitoring reports, required by 20 CSR 4240-20.090(6).

WHEREFORE, for the above-stated reasons, Staff recommends that the Commission issue an interim rate adjustment order (1) approving Empire's Tariff Sheet, P.S.C. MO. No. 5, Sec 4, 2nd Revised Sheet No. 17q, Canceling P.S.C. Mo. No 5, Sec 4, 1st Revised Sheet No. 17q, to become effective June 1, 2021, subject to true-up and prudence reviews; and (2) containing language per Empire's request that (A) the Commission finds that it is likely that extraordinary costs deferred by Empire ordinarily recovered through the fuel adjustment clause mechanism will be provided recovery in future base rate levels if found prudent, and (B) Any and all ratemaking determinations regarding the extraordinary cost deferral are reserved for future rate proceedings.

Respectfully submitted,

/s/ Jeffrey A. Keevil
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System (EFIS) this 3rd day of May, 2021.

/s/ Jeffrey A. Keevil

M E M O R A N D U M

TO: Missouri Public Service Commission Official Case File
File No. ER-2021-0332, Tariff Tracking No. JE-2021-0178
The Empire District Electric Company

FROM: Brooke Mastrogiannis, Utility Regulatory Supervisor

DATE:	/s/ Brad Fortson 05/03/2021	/s/ Jeff Keevil 05/03/2021
	Energy Resources Department / Date	Staff Counsel Department / Date

SUBJECT: Staff Recommendation for Approval of Tariff Sheet Filed to Change Rates Related to The Empire District Electric Company d/b/a Liberty-Empire's Fuel Adjustment Clause .

DATE: May 3, 2021

Summary and Staff Recommendation

On April 1, 2021, The Empire District Electric Company ("Liberty-Empire" or "Company") filed one (1) proposed tariff sheet, 2nd Revised Sheet No. 17q Canceling 1st Revised Sheet No. 17q, bearing a proposed effective date of June 1, 2021, to revise its Current Period Fuel Adjustment Rates[1] ("FARs") of its Fuel Adjustment Clause ("FAC") used to determine the Fuel Adjustment Charge[2] on customers' bills. Liberty-Empire also filed direct testimony of its witness Charlotte T. Emery on April 1, 2021 and submitted to Commission Staff ("Staff") work papers in support of the proposed tariff sheet. The Commission assigned the tariff sheet to Tariff Tracking No. JE-2021-0178.

For this Accumulation Period Liberty-Empire's actual total energy costs eligible for the FAC were significantly higher than the base energy cost included in Liberty-Empire's Missouri rates. Under normal circumstances, the Company would file a FAC rate tariff that is designed to recover 95 percent of the energy cost differences, or approximately $167,436,489. However, the Company is seeking approval to defer $168,720,211 of what it states are extraordinary costs. This is pursuant to Commission Rule 20 CSR 4240-20.090(8)(A)2.AXI, which states, "For the period of historical costs which are being used to propose the fuel adjustment rates... Extraordinary costs not to be passed through, if any, due to such costs being

[1] The Current Period FARs for service at primary voltage and above and for service at secondary voltage are located on lines 14 and 15, respectively, of proposed 2nd Revised Sheet No. 17q.
[2] The actual line item on the customer's bill is: Fuel Adjust Charge.

an insured loss, or subject to reduction due to litigation or for any other reason." Considering the deferral amount pertaining to the February Storm Uri extraordinary costs, the Company is proposing to use the remaining credit balance of $1,283,722 in the Accumulation Period to offset the under-recovery from its Missouri customers of the prior Recovery Period. In addition to the Company's proposal to defer $168,720,211 of "extraordinary costs"[3], Ms. Emery has also proposed the Commission approve language in this preceding providing that Liberty-Empire continues to have a reasonable expectation of recovery of these deferred costs. She states:

Q. Is Empire requesting specific language from the Commission regarding these "extraordinary costs" being pulled from the FAC mechanism?

> A. Yes, specific language is needed from the Commission regarding the deferral of these FAC-eligible fuel costs, in order for the Company to be able to assist its Missouri customers in this manner. For these costs to remain as a deferred debit (182.3) on the Company's Generally Accepted Accounting Principles ("GAAP") financial statements, the Company needs to have a reasonable expectation of recovery. Because these costs would normally have been recoverable from customers (subject to a prudency review), as they are FAC-eligible fuel costs incurred on behalf of Missouri customers, Empire requests language in an order in this proceeding providing that Empire continues to have a reasonable expectation of recovery of these deferred costs. In order for Empire to assist its Missouri customers in this manner, it is important that the Commission's traditional AAO language not be included in the Commission's order regarding the fuel costs being deferred as part of this proceeding.

Empire is proposing that the portion of its fuel costs associated with February Storm Uri be treated in a different manner than would normally be afforded through the FAC mechanism. Staff agrees that the Storm Uri costs are "extraordinary" in nature, based both upon the applicable language in the FAC rule quoted above and the broad definition of "extraordinary costs" commonly used by the Commission in other accounting authority order deferral applications (i.e., costs are that unusual, unique and non-recurring). For this reason, Staff does not oppose Empire's proposal to defer Storm Uri costs to seek later recovery in rates.

[3] As stated in response to Staff Data Request No.0361 in Case No. AO-2021-0264, Liberty-Empire anticipates S120 settlements and potentially additional costs extending into some point in the future but is unclear at this time how far out to expect those costs. S120 stands for 120 days after the end of the period covered by the settlement statement.

Staff agrees that, for the $168,720,211 to be booked as an accounting deferral under GAAP, Empire needs to have a reasonable expection of recovery of these deferred costs[4], subject to a full prudence review conducted prior to any rate recovery of the amounts. Staff is not opposed to the Commission including language to this effect in its order issued in this proceeding. However, all questions regarding the details of the ratemaking parameters to be applied to the deferrals, including but not limited to prudence of the costs, the length of any amortization period, whether rate base treatment should be afforded deferral balances, and inclusion of carrying costs applied to the deferral balance, should be reserved to future rate cases.

Liberty-Empire's AP25 FARs

The testimony and work papers include information that supports Liberty-Empire's calculation of the dollar amount[5] used to calculate the FARs for Accumulation Period 25 ("AP25"). That dollar amount is $0[6] and results from:

1. The amount of $167,436,489, found on Line 7 of 2nd Revised Sheet No. 17q, which is equal to 95% of the difference between: a) Liberty-Empire's Missouri jurisdiction[7] actual fuel costs plus purchased power costs plus net emissions allowance costs less off-system sales revenue[8] and less renewable energy credits ("REC") revenue and b) Liberty-Empire's Missouri jurisdiction net base energy cost[9] during AP25; plus
2. The true-up amount of $1,293,237[10] which is the under-recovery amount of the

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[4] It is Staff's understanding that the 95% sharing percentage has already been applied to the $168,720,211 deferral amount.

[5] The dollar amount used to calculate the Current Period FAR is called the Fuel and Purchased Power Adjustment ("FPA") which is located on line 11 of proposed 2nd Revised Sheet No. 17q.

[6] As footnote 3 explains in the proposed 2nd Revised Sheet No. 17q, "For this accumulation period only, the Fuel and Purchased Power Adjustment (FPA), on line 11, is calculated by taking the total of $167,436,489, on line 7, and reducing it by the extraordinary cost of $168,720,211, that the Company is seeking to defer, for a net of ($1,283,722). The True-up Amount of $1,293,237, on line 8,and the Interest Expense of ($9,515), on line 10, are added to the net of ($1,283,722). This brings the Total Fuel and Purchased Power Adjustment to $0.

[7] Missouri Energy Ratio (J) = (Missouri retail kWh sales)/(Total system kWh sales), where Total system kWh sales includes sales to municipalities that are associated with Liberty-Empire and excludes off-system sales. See Original Sheet No 17aa. For AP25, J is equal to 90.18% as reflected on line 4 of 2nd Revised Sheet No. 17q. The 90.18 J factor is derived from dividing total Missouri Retail kWh Sales for this accumulation period by the Total System kWh Sales for this accumulation period. As explained in footnote 2 of the current tariff, Liberty-Empire calculates (TEC-B)*J on a monthly basis, and Line 5 is the sum of each month's calculation. For this reason, the calculation of the total energy cost minus the net base energy cost (line 3) multiplied by the Missouri Energy Factor (line 4) does not equal the amount entered on line 5. Line 3 multiplied by line 4 equals $176,247,597.

[8] For AP25, this amount is $255,868,458 as reflected on line 1 of 2nd Revised Sheet No. 17q.

[9] For AP25, this amount is $60,428,674 as reflected on line 2 of 2nd Revised Sheet No. 17q.

[10] Liberty-Empire's RP23 true-up filing is contained in File No. EO-2021-0333.

FARs for Recovery Period 23 ("RP23"), found on Line 8 of 2nd Revised Sheet No. 17q; plus

3. The interest for AP25, a portion of RP23[11], and a portion of RP24[12], all equal to $(9,515), found on Line 10 of 2nd Revised Sheet No. 17q.

The Current Period FAR of $.00000 per kWh (Line 13 of 2nd Revised Sheet No. 17q) is equal to the FPA Amount of $0 divided by the forecasted Missouri net system input ("NSI") for RP25 of 2,273,827,774 kWh, found on Line 12 of 2nd Revised Sheet No. 17q.

Because of a difference in line losses, there are different FARs for service taken at primary and above voltage levels and at secondary voltage level. When accounting for line losses for the different voltage levels, the proposed FARs are $.00000 per kWh for customers receiving service at primary voltage level and above, and $.00000 per kWh for customers receiving service at secondary voltage level. Liberty-Empire's present FARs are $(.00186) per kWh for customers receiving service at primary voltage level and above and $(.00190) per kWh for customers receiving service at secondary voltage level.[13]

Fuel Adjustment Rates ($ Per kWh)			
Service Voltage Level	Present	Proposed	Difference
Primary	$(.00186)	$.00000	$0.00186 Increase
Secondary	$(.00190)	$.00000	$0.00190 Increase

Based on a monthly usage of 1,000 kWh, the proposed change to the FAR will increase the Fuel Adjustment Charge of a Liberty-Empire residential customer's bill from $(1.90) to $0.00, an increase in the customer's bill of $1.90 per month.[14] The accumulation periods, recovery periods, and other specifications of Liberty-Empire's existing FAC are set out in its currently effective tariff sheets.

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[11] Recovery Period 23 is June 2020 through November 2020.
[12] Recovery Period 24 is December 2020 through May 2021.
[13] Lines 14 and 15 of 1st Revised Sheet No. 17q.
[14] In Charlotte T. Emery's direct testimony, on page 9 lines 7 through 16, she states, "Under normal circumstances and pursuant to Empire's FAC tariff, the Company would request to collect from its Missouri customers 95 percent of the energy cost differences or approximately $167,436,489. However, at this time, the Company is seeking to defer $168,720,211 of "extraordinary costs" pursuant to Rule 20 CSR 4240-20.090(8)(A)2AXI… After reflecting these adjustments/deferrals, this results in an average of $0.00000 per kWh sold during the upcoming Recovery Period."

On page 8, line 20 through page 9 line 5 of her filed testimony, Company witness Charlotte T. Emery describes the reasons for the increase in the FAR's base rates:

> Q. How did Liberty-Empire's average energy costs for the Accumulation Period compare to the costs included in base rates?
>
> A. Empire's average energy costs per kWh increased above the level build into its base electric rates, which is why the FAC rate tariff filed by the Company seeks an increase in the rates charged to the Missouri customers. More specifically, Empire's Missouri base rates included an average cost of energy per kWh of net system production of $0.02415 from September 1 through September 15 and $0.02338 from September 16 through February 28, 2021. Empire actually incurred average energy costs of $0.09924 per kWh during the Accumulation Period, which is $0.07586 per kWh, or about 324.5 percent more, than the average cost built into current base rates.

<u>Staff Review</u>

Staff reviewed Liberty-Empire's proposed 2nd Revised Sheet No. 17q Canceling 1st Revised Sheet No. 17q, the direct testimony of Liberty-Empire witness Charlotte T. Emery filed on April 1, 2021, and Liberty-Empire's monthly filings and work papers for AP25. Staff verified that the actual fuel costs plus purchased power costs plus net emissions allowance costs less off-system sales revenues and less REC revenues, match[15] the fuel costs plus purchased power costs plus net emissions allowance costs less off-system sales revenues and less REC revenues in Liberty-Empire's proposed 2nd Revised Sheet No. 17q Canceling 1st Revised Sheet No. 17q. Staff also reviewed Liberty-Empire's monthly interest rates that are applied to the monthly over- and under-recovery amounts for AP25, a portion of RP24, and a portion of RP23 and the calculation of the monthly interest amounts. The information filed with the tariff sheet and work papers includes sufficient data to calculate the FARs for AP25.

Attachment A includes five charts that provide a summary of Liberty-Empire's twenty-five (25) FAC rate adjustment filings. For purposes of this report only, Staff has included Charts 2A and 3A with the extraordinary costs included and Charts 2B and 3B with the extraordinary costs excluded. Chart 1 illustrates a) Liberty-Empire's FARs for primary and

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[15] Staff has verified that the actual fuel costs plus purchased power costs plus net emissions allowance costs less off-system sales revenues and less REC revenues do match the total energy costs in line 1 of proposed 2nd Revised Sheet No. 17q. However because Liberty-Empire is poroposing to defer $168,720,211 of extraordinary costs, Staff is making notice here that the costs in line 1 of the proposed tariff sheet do not match the proposed FPA amount the Company is requesting in line 11 of this same tariff sheet.

secondary voltage service levels for each of the twenty-four (25) accumulation periods, and b) that there have been thirteen (13) positive FARs, eleven (11) negative FARs, and one (1) zero FAR. Chart 2A illustrates Liberty-Empire's FAC cumulative under-collected amount[16] at the end of each of the twenty-five (25) accumulation periods with the cumulative under-collected amount through AP25 of approximately $226 million. Chart 2B illustrates Liberty-Empire's FAC cumulative under-collected amount at the end of each of the twenty-five (25) accumulation periods with the cumulative under-collected amount through AP25 of approximately $58 million. Chart 3A illustrates Liberty-Empire's FAC cumulative under-collected percentage of cumulative total energy costs at the end of each of the twenty-five (25) accumulation periods with the cumulative under-collected percentage through AP25 of approximately 11%. Chart 3B illustrates Liberty-Empire's FAC cumulative under-colleced percentage of cumulative total energy costs at the end of each of the twenty-five (25) accumulation periods with the cumulative under-collected percentage through AP25 of approximately 3%.

Staff Recommendation

Liberty-Empire filed the 2nd Revised Sheet No. 17q Canceling 1st Revised Sheet No. 17q, and based on Staff's review, Staff has determined that the adjustment is in compliance with Commission Rule 20 CSR 4240-20.090, Section 386.266 RSMo, and Liberty-Empire's FAC embodied in its tariff.

Commission Rule 20 CSR 4240-20.090(8)(H)[17] provides in part:

> (H) Within sixty (60) days after the electric utility files its testimony and tariff sheet(s) to adjust its FARs, the commission shall either—
> 1. Issue an interim rate adjustment order approving the tariff sheet(s) and the adjustments to the FARs;
> 2. Allow the tariff sheet(s) and the adjustments to the FARs to take effect without commission order; or
> 3. If it determines the adjustment to the FARs is not in accordance with the provisions of this rule, section 386.266, RSMo, and the FAC mechanism established in the electric utility's most recent general rate proceeding, reject the proposed rate sheets, suspend the timeline of the FAR adjustment filing, set a prehearing date, and order the parties to propose a procedural schedule. The

[16] A positive under-collected amount means the Total Energy Cost (defined on line 1 of 2nd Revised Sheet No. 17q as TEC = (FC + PP + E – OSSR – REC)) is greater than the Net Base Energy Cost (defined on line 2 of 2nd Revised Sheet No. 17q as $B = BF \times S_{AP}$). Conversely, a negative under-collected amount means the Total Energy Cost is less than the Net Base Energy Cost.

[17] Effective January 30, 2019.

commission may order the electric utility to file tariff sheet(s) to implement interim adjusted FARs to reflect any part of the proposed adjustment that is not in question.

Liberty-Empire has requested that the 2nd Revised Sheet No. 17q Canceling 1st Revised Sheet No. 17q filed on April 1, 2021, become effective on June 1, 2021. Thus, the tariff sheet was filed with sixty (60) days' notice. Based on its examination and analysis of the information Liberty-Empire filed and submitted in this case, Staff recommends the Commission issue an order approving the following proposed tariff sheet, to become effective on June 1, 2021, as requested by Liberty-Empire, subject to both true-up and prudence reviews:

P.S.C. Mo. No. 5 Section 4

2nd Revised Sheet No. 17q Cancelling 1st Revised Sheet No. 17q

Staff has verified that Liberty-Empire has filed its 2020 annual report and is not delinquent on any assessment. Liberty-Empire is current on its submission of its Surveillance Monitoring reports as required in 20 CSR 4240-20.090(6) and its monthly reports as required by 20 CSR 4240-20.090(5).

Staff's recommendation for approval of the Current Period FARs in this case is solely based on the accuracy of Liberty-Empire's calculations, and is not indicative of the prudence of the fuel costs during AP25.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of The Empire District Electric Company d/b/a	)	
Liberty (Empire) for Authority to Implement Rate Adjustments	)	**File No. ER-2021-0332**
Related to the Company's Fuel and Purchased Power	)	Tariff No. JE-2021-0178
Adjustment (FAC) Required in 20 CSR 4240-020.090	)	

AFFIDAVIT OF BROOKE MASTROGIANNIS

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW Brooke Mastrogiannis, and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation to Approve Tariff Shee*t*;* and that the same is true and correct according to her best knowledge and belief, under penalty of perjury.

Further the Affiant sayeth not.

/s/ *Brooke Mastrogiannis*
Brooke Mastrogiannis

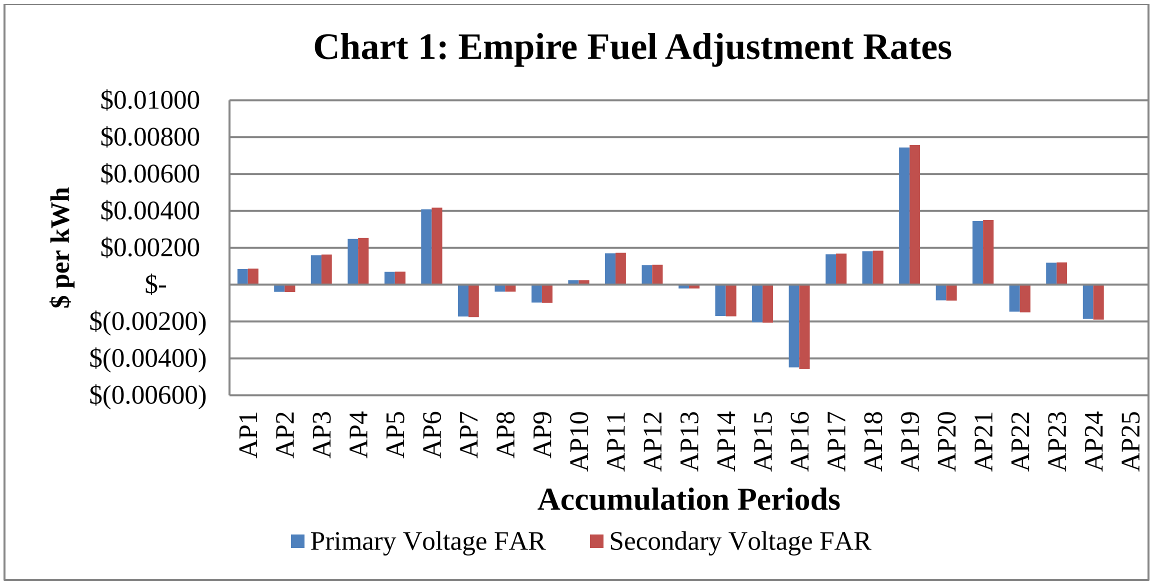
Chart 1: Empire Fuel Adjustment Rates
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Accumulation Periods
Primary Voltage FAR
Secondary Voltage FAR

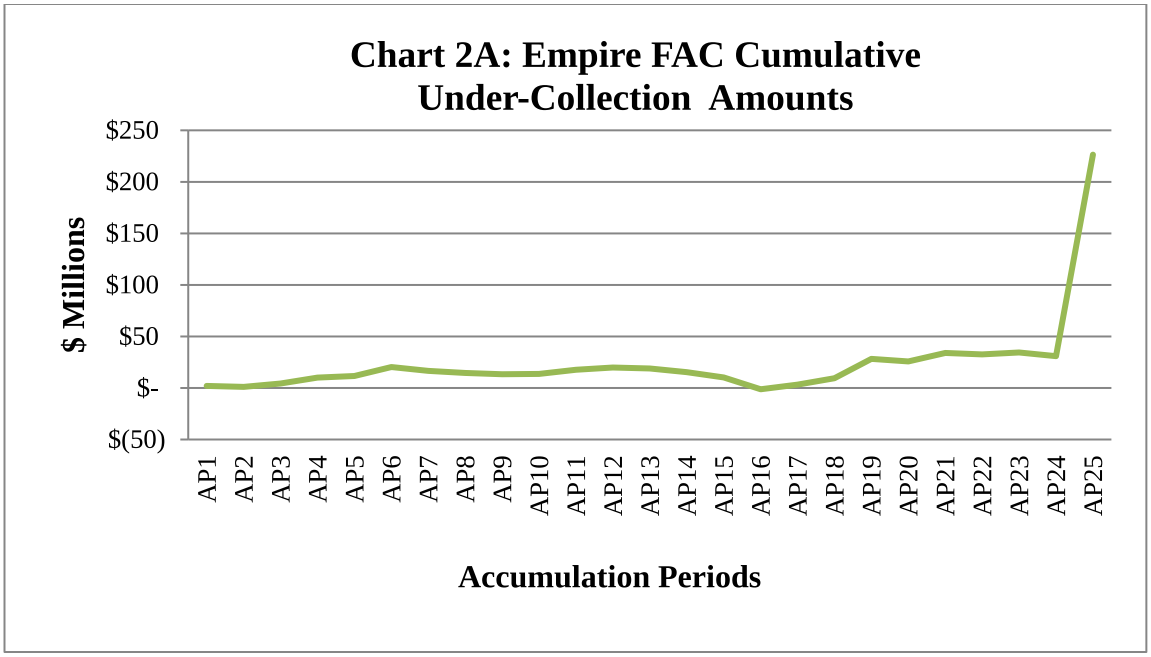

*Chart 2A above includes the extraordinary costs of $168,720,211 for AP25

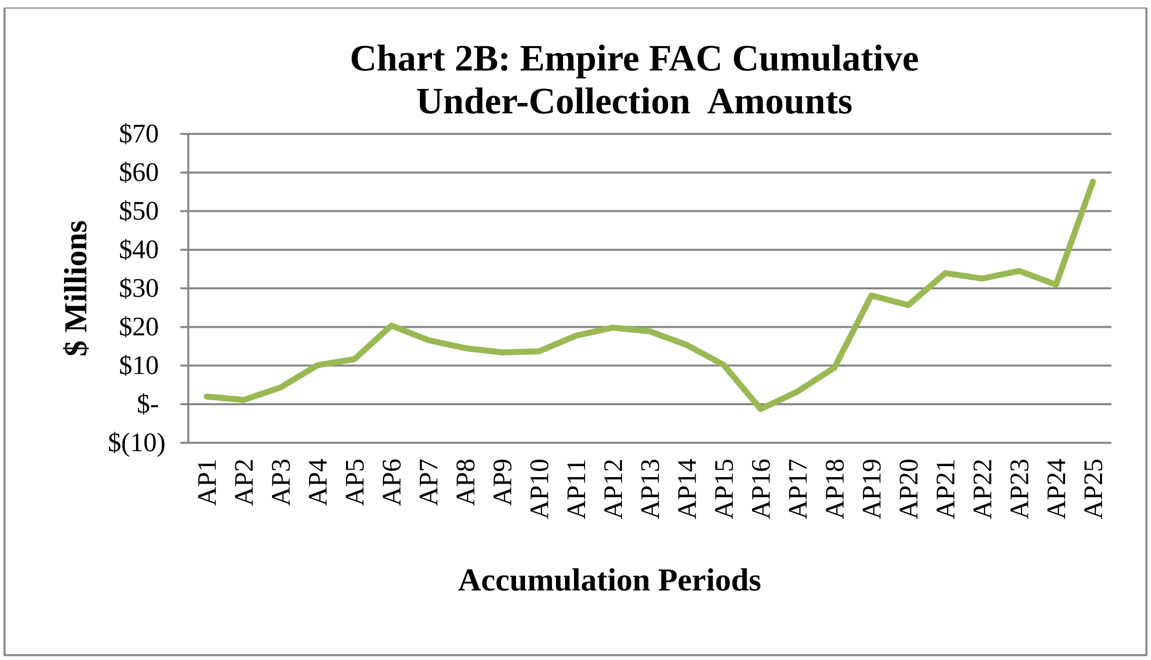

*Chart 2B above does not include the extraordinary costs of $168,720,211 for AP25

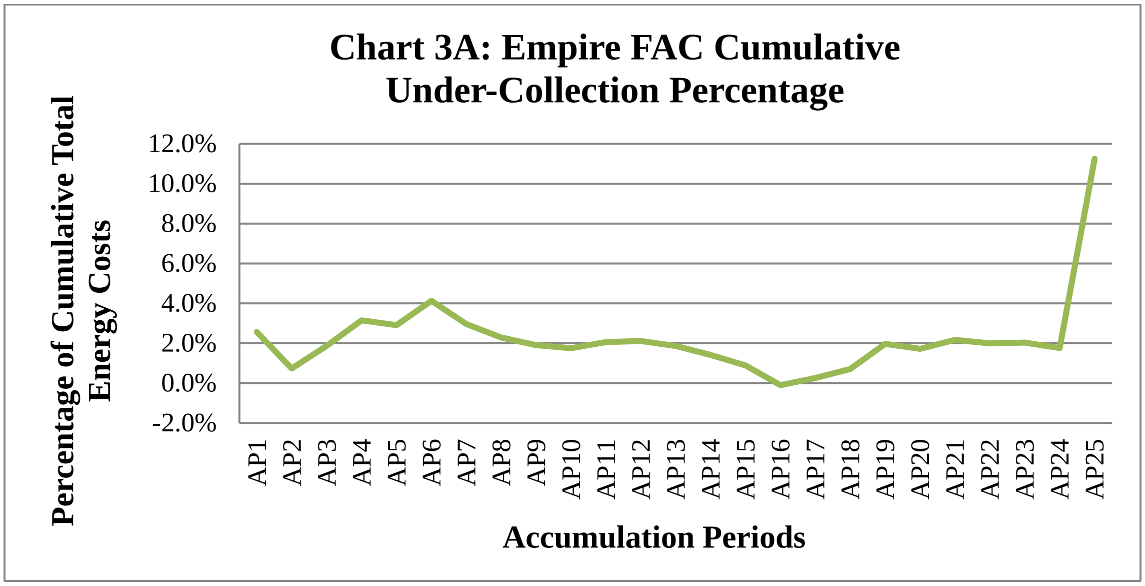

*Chart 3A above includes the extraordinary costs of $168,720,211 for AP25

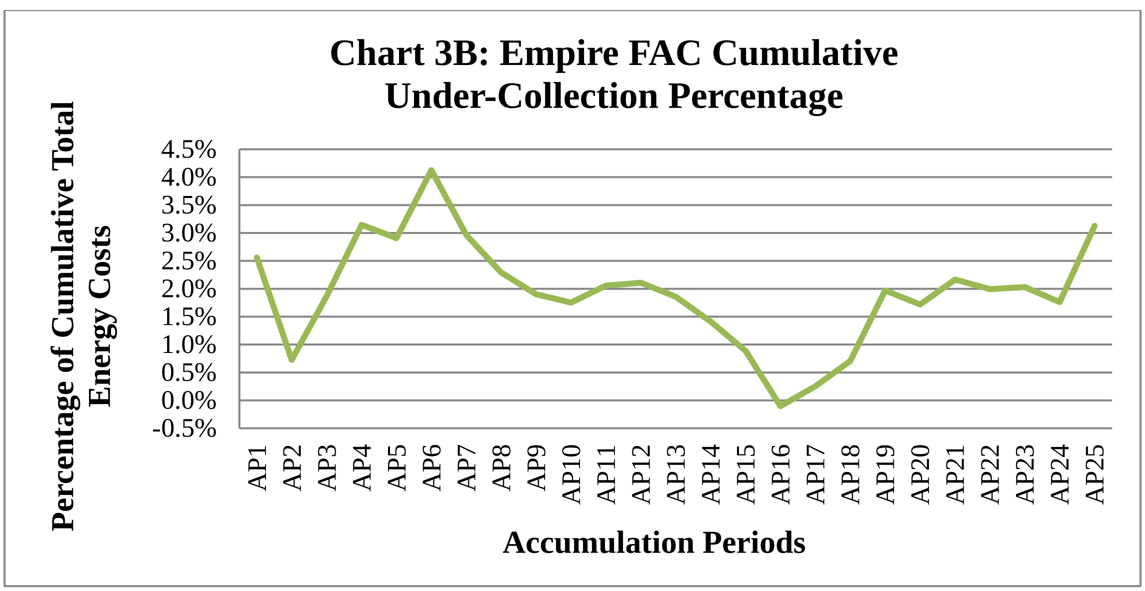

*Chart 3B above does not include the extraordinary costs of $168,720,211 for AP25