

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

In the Matter of the Application of The)
Empire District Electric Company for) Case No. EO-2018-0092
Approval of Its Customer Savings Plan)

State of Missouri)
) SS
Jasper County)

Affidavit of Peter Edwards

Peter Edwards, being first duly sworn, on his oath states:

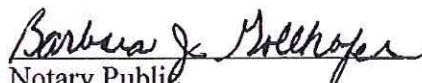
1. My name is Peter Edwards. I am the City Attorney for the City of Joplin.
2. Attached hereto and made a part hereof for all purposes is my affidavit in opposition to the Non-Unanimous Stipulation and Agreement which was filed in Case No. E0-2018-0092 on April 24, 2018.
3. I hereby swear and affirm that my affidavit is true and correct and that it shows the matters and things that it purports to show.



Peter Edwards

Subscribed and sworn to me before this 4th day of May, 2018.




Notary Public

Joplin Exhibit No. 500
Date 5-09-18 Reporter XF
File No. EO-2018-0092



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**AFFIDAVIT OF PETER EDWARDS IN OPPOSITION TO NONUNANIMOUS
STIPULATION AND AGREEMENT FILED APRIL 24, 2018**

Capacity

The Empire District Electric Company already has more than sufficient generating resources to serve its customers. Excluding Asbury, Empire’s current generation resources total 1233 MW.¹ Asbury has an accredited capacity of 198 MW.² Empire historical all-time peak was 1199 MW.³

Uncertainties

There are numerous uncertainties⁴ in Empire’s original proposal and which remain uncertain under the Stipulation and Agreement. The risks associated with such uncertainties falls on Empire’s customers. Such uncertainties include, but are not limited to: Identification of Contractor for Wind Project;⁵ Identification of Tax Equity Partner;⁶ Location of Wind Projects;⁷ Transmission Costs;⁸ Market Prices in the SPP Market;⁹ Generation mix at SPP;¹⁰ and Frequency of Negative Market Prices.¹¹

¹ Mertens Direct, p. 17.

² Mertens Direct, p. 16.

³ Mertens Direct, p. 17.

⁴ See generally, Mantle Surrebuttal, Schedule LMM-S-1.

⁵ Meyer Rebuttal, p. 4.

⁶ Meyer Rebuttal, 4.

⁷ Meyer Rebuttal, 4.

⁸ Meyer Rebuttal, 4.

⁹ Mantle Rebuttal, 6; Meyer Rebuttal, 10.

¹⁰ Mantle Rebuttal 13; Meyer Rebuttal, 16.

¹¹ Mantle, 8-9; Meyer Rebuttal, 16-17.

Rate Impacts

The citizens of Joplin have already experienced significant rate increases in recent years as evidenced below.

October 2, 2001		
Residential Service - Monthly Rate		
	Summer Season	Winter Season
Customer Charge	8.22	8.22
The first 600-kWh, per kWh	0.0697	0.0697
Additional kWh, per kWh	0.0697	0.0411

Current Rates		
Residential Service - Monthly Rate		
	Summer Season	Winter Season
Customer Charge	13.00	13.00
The first 600-kWh, per kWh	0.13006	0.13006
Additional kWh, per kWh	0.13006	0.10574

Percentage Increase		
	Summer Season	Winter Season
Customer Charge	58.15%	58.15%
The first 600-kWh, per kWh	86.60%	86.60%
Additional kWh, per kWh	86.60%	157.27%

The "Customer Savings Plan" proposed by the Company, as modified by the Stipulation and Agreement will increase current rates by an additional 12%.¹²

Joplin Position on Stipulation

The City of Joplin maintains its position as set forth in its previously filed Position Statement and Objection -- in opposition to both the Customer Savings Plan as originally filed and to the Nonunanimous Stipulation and Agreement filed April 24, 2018.

¹² Supporting Affidavit of Greg Meyer.