

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

In the Matter of The Empire )  
District Electric Company’s Request )  
For Authority to Implement a General )  
Rate Increase for Electric Service )

**Case No. ER-2016-0023**  
Tracking No.: YE-2017-0120

**Public Counsel’s Response to Commission Order Suspending Empire’s  
Demand Side Management Tariff Sheets and Objection to Tariff Sheet**

COMES NOW the Office of the Public Counsel (“OPC” of “Public Counsel”) in *Response* to the Missouri Public Service Commission’s (“Commission”) *Order Suspending Tariff Sheets* related to Empire District Electric Company’s (“Empire”) Demand Side Management programs and for its Objection states:

1. On August 10, 2016, the Commission issued its *Order Approving Stipulation and Agreement* that resolved Empire’s rate case (Doc. No. 179).
2. On December 2, 2016, Empire filed tariff sheets pertaining to Demand Side Management (“DSM”) programs it had agreed to develop and pursue in the stipulation and agreement approved by the Commission on August 10, 2016 (Doc. No. 278).
3. The Commission issued an Order suspending the tariff sheets on December 30, 2016 and directing parties to file responses indicating if Empire’s tariff sheets are in compliance with the Commission’s August 10, 2016 Order (Doc. No. 279).
4. Public Counsel has reviewed the tariff sheets filed on December 2, 2016 and states that it is of the opinion that Empire’s proposed DSM tariff sheets are not in compliance with the Commission’s Order and so Public Counsel Objects to the tariff sheets.<sup>1</sup>

---

<sup>1</sup> Pursuant to Commission Rule 4 CSR 240-2.065(3) the tariff sheets are attached to this pleading as Appendix A.

5. The stipulation and agreement approved by the Commission contained Empire's agreement to "work together through the existing DSMAG to develop four (4) new DSM programs, namely, a Residential HVAC, a C&I custom rebate, a low-income multi-family, and either a non-low-income multi-family, single family low-income or an on-bill financing program targeted at low-income families." (Doc. No. 179, Attachment A, p. 6). Empire's tariff sheets include information outlining four programs including (1) Customer C&I Program, (2) Income-Eligible Multi-Family direct Install, (3) Multi-Family Direct Install, and (4) Residential HVAC Program.

6. The signatories further agreed that "[t]he DSMAG will investigate Pay As You Save ("PAYS") Financing and similar programs, the feasibility of administering PAYS Financing and similar programs in Empire's service territory, and Empire will arrange for a presentation on PAYS Financing or a similar program at a Commission Agenda meeting." (*Id.* at 7). Absent from the tariff sheets is any indication that Empire or the DSMAG group will investigate or study the feasibility of administering a PAYS program.

7. Public Counsel understands that Empire has communicated to the DSMAG group its belief a PAYS program would be incompatible with its present billing system and that the company does not intend to pursue the program at this time. Such an outcome is insufficient to comply with the stipulated terms. Instead the Company should investigate feasibility by identifying what is necessary to implement a PAYS program in its service territory and whether the benefits attained would outweigh the cost of implementation.

8. In order to ensure Empire is able to meet this stipulated term, OPC requests the Commission direct Empire to amend its 2<sup>nd</sup> Revised Sheet No. 8e relating to DSM program budgets to specifically identify a PAYS program feasibility study. OPC suggests the 2017 budget

for each of the four listed programs be reduced by \$2,500. The \$10,000 would be added to a new section identifying the PAYs program budget with the following language:

PAYs Financial Feasibility Study

Program Year	Budget
2017	\$10,000

9. Public Counsel believes specific language in the tariff sheets that identifies the budget allocation for a PAYS feasibility study will ensure the Company and the DSMAG group will continue to investigate and pursue a PAYs program as ordered by the Commission on August 10, 2016. Because the tariff sheets filed by the company do not contain such language, Public Counsel requests the Commission reject the tariff sheets filed on December 2, 2016 and direct the Company to file an amended 2<sup>nd</sup> Revised Sheet No. 8e containing a budget allocation for a PAYs study.

WHEREFORE, the Office of the Public Counsel submits this *Response to Commission Order Suspending Empire's Demand Side Management Tariff Sheets and Objection to Tariff Sheet*; requests the Commission reject Empire's filed 2<sup>nd</sup> Revised Sheet No. 8e; and requests the Commission direct Empire to file an amended 2<sup>nd</sup> Revised Sheet No. 8e containing the budget allocation described above.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

/s/ Tim Opitz

Tim Opitz  
Deputy Public Counsel  
Missouri Bar No. 65082  
P. O. Box 2230  
Jefferson City MO 65102  
(573) 751-5324  
(573) 751-5562 FAX  
Timothy.opitz@ded.mo.gov

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 10<sup>th</sup> day of January 2017:

**Missouri Public Service Commission**

Staff Counsel Department  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, MO 65102  
staffcounsel@psc.mo.gov

**City of Joplin, Missouri**

Stephanie S Bell  
308 East High Street, Suite 301  
Jefferson City, MO 65101  
sbell@bbdlc.com

**City of Joplin, Missouri**

Marc H Ellinger  
308 E. High Street, Ste. 301  
Jefferson City, MO 65101  
mellinger@blitzbardgett.com

**Empire District Electric Company**

Diana C Carter  
312 E. Capitol Avenue  
P.O. Box 456  
Jefferson City, MO 65102  
DCarter@brydonlaw.com

**Midwest Energy Consumers Group**

David Woodsmall  
807 Winston Court  
Jefferson City, MO 65101  
david.woodsmall@woodsmalllaw.com

**Midwest Energy Users' Association**

Stuart Conrad  
221 East Main St.  
PO Box 186  
Cleveland, MO 64734  
stucon@swclaw.net

**Missouri Division of Energy**

Alexander Antal  
10 Clinton Dr., Unit A  
Columbia, MO 65203-6520  
Alexander.Antal@ded.mo.gov

**Missouri Public Service Commission**

Kevin Thompson  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, MO 65102  
kevin.thompson@psc.mo.gov

/s/ **Tim Opitz**

---

THE EMPIRE DISTRICT ELECTRIC COMPANY

P.S.C. Mo. No. 5 Sec. 4 5th Revised Sheet No. 8a

Canceling P.S.C. Mo. No. 5 Sec. 4 4th Revised Sheet No. 8a

For ALL TERRITORY

PROMOTIONAL PRACTICES  
SCHEDULE PRO

C. Custom Commercial and Industrial ("C&I") Rebate Program

APPLICATION:

The Custom Commercial and Industrial ("C&I") Rebate Program (Program) is designed to encourage the efficient use of energy by providing rebates to cover a portion of the costs associated with the purchase and installation of energy efficient equipment in commercial and industrial facilities. The Empire District Electric Company's (Company) participation in such financial incentives is limited to the amount of Funds available as determined by the Stipulation and Agreement approved by the Missouri Public Service Commission (Commission) in Case No. ER-2016-0023.

DEFINITIONS:

*Administrator* – The Company will administer the program.

*Cost-Benefit Analysis* – Analysis of the cost-effectiveness of an energy efficiency project using tests as outlined in the California Standard Practice Manual ("California Manual").

*DSM Advisory Group ("DSMAG")* –An advisory collaborative consisting of Company stakeholders including Missouri Public Service Commission Staff, Missouri Department of Economic Development – Division of Energy, Dogwood Energy, LLC, and the Missouri Office of Public Counsel. The Company will meet with the DSMAG no less than quarterly to report on participation in its energy efficiency programs, discuss successes and challenges, report on expenditures and remaining budgets balances, and work together toward the continuous improvement of the Company's energy efficiency offerings.

*Eligible Participant* –Electric retail customer in rate schedules CB, SH, GP, PFM, TEB, and LP being served by the Company in its Missouri electric service territory electing to purchase electrical energy efficiency upgrades through the Program. A customer with multiple locations or meters will only be eligible for a single rebate. Licensed franchises will be considered separate customers, and multiple franchisees will be considered Eligible Participants, not subject to the maximum annual incentive of \$100,000.

*Funds* –The annual allotted amount of money available for the C&I Rebate Program, as found on Sheet 8e.

*Program Period* – Per the Stipulation and Agreement approved by the Commission in Case No. ER-2016-0023, the program will have a term of not less than two (2) years.

*Rebates* – Custom rebates will be available to all Eligible Participants, as defined above. Prior to the purchase or installation of equipment, each potential rebate will be individually determined and analyzed to ensure it passes the cost-benefit analysis. The amount of the custom rebate will be calculated as the lesser of the following:

- \$0.10/kWh of first year energy savings
- Fifty (50) percent of the incremental cost; and
- \$50,000

Empire reserves the right to adjust the figure of \$0.10/kWh of first-year energy savings up or down, dependent on market conditions and participation, and will inform the DSMAG of its intent prior to making a change. Incremental costs refer to the difference between the cost of energy efficient equipment and the cost of standard equipment.

AVAILABILITY:

The Program will be offered during the Program Period and is voluntary and available on a first-come, first-served basis to any eligible participant until funds for that program year have been committed and/or expended. One Eligible Participant can receive a maximum annual incentive of \$100,000 in a given calendar year, based on the date the check is issued by the Company. Eligible Participants must issue invoices verifying completion of a project by December 15<sup>th</sup> of a given year to ensure the incentive will be received before January 31 of the following year, meaning it will apply to the preceding calendar year for purposes of the annual maximum incentive. One Eligible Participant may submit multiple rebate applications for different measures, each of which will be evaluated on its own merits. Similar measures proposed in different facilities or buildings will be evaluated separately.

TERMS & CONDITIONS:

This Program will provide rebates to Participants that install, replace or retrofit qualifying electric savings measures including HVAC systems, motors, lighting, pumps, etc. Terms of the rebate are:

THE EMPIRE DISTRICT ELECTRIC COMPANY

P.S.C. Mo. No. 5 Sec. 4 3rd Revised Sheet No. 8a.1

Canceling P.S.C. Mo. No. 5 Sec. 4 2nd Revised Sheet No. 8a.1

For ALL TERRITORY

PROMOTIONAL PRACTICES SCHEDULE PRO
---------------------------------------

C. Custom Commercial and Industrial ("C&I") Rebate Program (Continued)

1. Rebates are available to all Participants, as defined in sheet 8a. above.
2. Rebates will be calculated and subject to Availability, as defined in sheet 8a. above.
3. Eligible Participants may obtain an application for the program on the Company's website, or may request a paper copy by contacting Empire's Customer Service department at 800-206-2300. Applications will be considered only after the customer has supplied the Company and/or its implementation contractor with all required and requested documentation.
4. Projects must be preapproved prior to purchase and/or installation of equipment. Applications made after equipment has been purchased or installed will not be eligible. Customers and/or contractors will receive official dated communication from the Company and/or its implementation contractor indicating their preapproval. No other communication will be considered preapproval. If final invoices show a date prior to the date of official preapproval, the project will not receive its committed rebate.

PROGRAM FUNDING:

Unspent budgeted allocations may be moved between programs. If the total portfolio expenditures are less than the total portfolio budget in a given program year, the difference will be added to the total portfolio budget for the following program year, and allocated between programs at Empire's discretion. The DSMAG will be notified prior to the reallocation of funds between programs or to the reallocation of funds to the following program year.

THE EMPIRE DISTRICT ELECTRIC COMPANY

P.S.C. Mo. No. 5 Sec. 4 2nd Revised Sheet No. 8c.1

Canceling P.S.C. Mo. No. 5 Sec. 4 1st Revised Sheet No. 8c.1

For ALL TERRITORY

PROMOTIONAL PRACTICES SCHEDULE PRO
---------------------------------------

F. Income-Eligible Multi-Family Direct Install Program

APPLICATION:

The Income-Eligible Multi-Family Direct Install Program (Program) is designed to improve the energy efficiency of low-income multi-family dwellings in The Empire District Electric Company's (Company) Missouri service territory by offering kits containing direct-install measures (e.g., high-efficiency light bulbs, showerheads, sink aerators, etc.) to the owners of those buildings. The Company's participation in such financial incentives is limited to the amount of Funds available as determined by the Stipulation and Agreement approved by the Missouri Public Service Commission (Commission) in Case No. ER-2016-0023.

DEFINITIONS:

*Administrator:* The Company will administer the Program.

*DSM Advisory Group ("DSMAG")* –An advisory collaborative consisting of Company stakeholders including Missouri Public Service Commission Staff, Missouri Department of Economic Development – Division of Energy, Dogwood Energy, LLC, and the Missouri Office of Public Counsel. The Company will meet with the DSMAG no less than quarterly to report on participation in its energy efficiency programs, discuss successes and challenges, report on expenditures and remaining budget balances, and work together toward the continuous improvement of the Company's energy efficiency offerings

*Energy Efficiency Kits:* A single offering made to qualifying participants which contains within it a variety of direct-install energy efficiency measures, such as high-efficiency light bulbs, high-efficiency showerheads, or sink aerators.

*Funds:* The annual allotted amount of money available for the Income-Eligible Multi-Family Direct Install Program, as found on Sheet 8e.

*Program Period* – Per the Stipulation and Agreement approved by the Commission in Case No. ER-2016-0023, the program will have a term of not less than two (2) years.

*Qualified Multi-Family Dwelling:* A single federally-subsidized low-income residential structure with four or more separate housing units, which are metered individually under the Company's Missouri residential retail electric rate.

*Qualified Participant:* Owners of Qualified Multi-Family Dwellings and their occupants, who must be residential retail electric customers in the Company's Missouri service territory.

AVAILABILITY:

The Program will be offered during the Program Period and is voluntary and available on a first-come, first-served basis to any eligible participant until funds for that program year have been committed and/or expended. Energy efficiency kits will be distributed to and installed by owners of Qualified Multi-Family Dwellings.

TERMS & CONDITIONS:

Installation of Energy Efficiency Kits must be provided by building owners. Energy Efficiency Kits will be distributed only to building owners whose buildings qualify as low-income. The number of Energy Efficiency Kits issued to building owners will be determined by the number of qualifying housing units in the building. The Company, at its discretion, may determine and change the contents of the Energy Efficiency Kits, provided the items have a verifiable and measurable energy savings value. The Company will notify the DSMAG prior to any changes regarding the contents of Energy Efficiency Kits.

PROGRAM FUNDING:

Unspent budgeted allocations may be moved between programs. If the total portfolio expenditures are less than the total portfolio budget in a given program year, the difference will be added to the total portfolio budget for the following program year, and allocated between programs at The Company's discretion. The DSMAG will be notified prior to the reallocation of funds between programs or to the reallocation of funds to the following program year.

DATE OF ISSUE December 2, 2016  
ISSUED BY Kelly S. Walters, Vice President, Joplin, MO

DATE EFFECTIVE January 1, 2017

THE EMPIRE DISTRICT ELECTRIC COMPANY

P.S.C. Mo. No. 5 Sec. 4 2nd Revised Sheet No. 8c.2

Canceling P.S.C. Mo. No. 5 Sec. 4 1st Resided Sheet No. 8c.2

For ALL TERRITORY

PROMOTIONAL PRACTICES SCHEDULE PRO
---------------------------------------

G. Multi-Family Direct Install Program

APPLICATION:

The Multi-Family Direct Install Program (Program) is designed to improve the energy efficiency of multi-family dwellings in The Empire District Electric Company's (Company) Missouri service territory by offering kits containing direct-install measures (e.g., high-efficiency light bulbs, showerheads, sink aerators, etc.) to the owners and/or tenants of those buildings. The Company's participation in such financial incentives is limited to the amount of Funds available as determined by the Stipulation and Agreement approved by the Missouri Public Service Commission (Commission) in Case No. ER-2016-0023.

DEFINITIONS:

*Administrator:* The Company will administer the Program.

*DSM Advisory Group ("DSMAG")* – An advisory collaborative consisting of Company stakeholders including Missouri Public Service Commission Staff, Missouri Department of Economic Development – Division of Energy, Dogwood Energy, LLC, and the Missouri Office of Public Counsel. The Company will meet with the DSMAG no less than quarterly to report on participation in its energy efficiency programs, discuss successes and challenges, report on expenditures and remaining budgets balances, and work together toward the continuous improvement of the Company's energy efficiency offerings.

*Energy Efficiency Kits:* A single offering made to qualifying participants which contains within it a variety of direct-install energy efficiency measures, such as high-efficiency light bulbs, high-efficiency showerheads, or sink aerators.

*Funds:* The annual allotted amount of money available for the Multi-Family Direct Install Program, as found on Sheet 8e.

*Qualifying Multi-Family Dwelling:* A single residential structure with four or more separate housing units, which are metered individually under The Company's Missouri residential retail electric rate.

*Participant:* Owners of multi-family dwellings and/or tenants, who must be residential retail electric customers in The Company's Missouri service territory.

*Program Period* – Per the Stipulation and Agreement approved by the Commission in Case No. ER-2016-0023, the program will have a term of not less than two (2) years.

AVAILABILITY:

The Program will be offered during the Program Period and is voluntary and available on a first-come, first-served basis to any eligible participant until funds for that program year have been committed and/or expended. Energy efficiency kits will be distributed to and installed by either the owners of Qualifying Multi-Family Dwellings or individual tenants of these buildings.

TERMS & CONDITIONS:

Installation of Energy Efficiency Kits may be provided by building owners, or by individual tenants of multi-family dwellings. The Company will not be held responsible for multi-family dwelling occupants who violate terms of a lease or occupancy agreement by choosing to personally install the contents of the Energy Efficiency Kits. The number of Energy Efficiency Kits issued to building owners will be determined by the number of qualifying housing units in the building. The Company, at its discretion, may determine and change the contents of the Energy Efficiency Kits, provided the items have a verifiable and measurable energy savings value. The Company will notify the DSMAG prior to any changes regarding the contents of Energy Efficiency Kits.

PROGRAM FUNDING:

Unspent budgeted allocations may be moved between programs. If the total portfolio expenditures are less than the total portfolio budget in a given program year, the difference will be added to the total portfolio budget for the following program year, and allocated between programs at The Company's discretion. The DSMAG will be notified prior to the reallocation of funds between programs or to the reallocation of funds to the following program year.



THE EMPIRE DISTRICT ELECTRIC COMPANY

P.S.C. Mo. No. 5 Sec. 4 3rd Revised Sheet No. 8d

Canceling P.S.C. Mo. No. 5 Sec. 4 2nd Revised Sheet No. 8d

For ALL TERRITORY

PROMOTIONAL PRACTICES  
SCHEDULE PRO

H. Heating, Ventilation, and Air Conditioning (“HVAC”) Rebate Program

APPLICATION:

The HVAC Rebate Program (Program) is designed to encourage the efficient use of energy through the purchase and installation of energy efficient HVAC systems by providing rebates to lower the cost of such improvements for residential customers. The Empire District Electric Company’s (Company) participation in such financial incentives is limited to the amount of Funds available as determined by the Stipulation and Agreement approved by the Missouri Public Service Commission (Commission) in Case No. ER-2016-0023.

DEFINITIONS:

*Administrator:* The Company will administer the Program.

*DSM Advisory Group (“DSMAG”)* – An advisory collaborative consisting of Company stakeholders including Missouri Public Service Commission Staff, Missouri Department of Economic Development – Division of Energy, Dogwood Energy, LLC, and the Missouri Office of Public Counsel. Empire will meet with the DSMAG no less than quarterly to report on participation in its energy efficiency programs, discuss successes and challenges, report on expenditures and remaining budget balances, and work together toward the continuous improvement of Empire’s energy efficiency offerings.

*Funds* – The annual allotted amount of money available for the HVAC Rebate Program, as found on Sheet 8e.

*Participant:* Electric residential customers, owners of residential rental property, and builders of residential structures being served by the Company in its Missouri retail electric service territory electing to upgrade or install central cooling or heating systems with a SEER value of 15 or higher.

*Program Period* – Per the Stipulation and Agreement approved by the Commission in Case No. ER-2016-0023, the program will have a term of not less than two (2) years.

*SEER:* Seasonal Energy Efficiency Ratio, the efficiency rating for the heating or cooling system over a range of expected external temperatures (i.e., the temperature distribution for the geographical location for the SEER test). SEER rating is the Btu of cooling output during a simulated, typical cooling season divided by the total electric energy input in watt-hours during the same period.

AVAILABILITY:

The Program will be offered during the Program Period and is voluntary and available on a first-come, first-served basis to any eligible participant until funds for that program year have been committed and/or expended. Customers whose homes have more than one central heating or cooling system are eligible to receive more than one rebate, if they replace more than one system. Customers who install qualifying mini-split heat pumps in their homes will be eligible for a maximum of one rebate per home.

TERMS & CONDITIONS:

This Program will provide rebates to all Participants purchasing and installing central cooling or heating systems. The available rebates are as follows:

SEER of 15 to 15.9	\$250
SEER of 16 to 16.9	\$350
SEER of 17 or higher	\$450
Mini-split Heat Pumps 17 SEER or Higher	\$300

Eligible Participants may obtain an application for the program on Empire’s Web site, or may request a paper copy by contacting Empire’s Customer Service department at 800-206-2300. Applications will be considered only after the customer has supplied Empire and/or its implementation contractor with all required and requested documentation.

PROGRAM FUNDING:

Unspent budgeted allocations may be moved between programs. If the total portfolio expenditures are less than the total portfolio budget in a given program year, the difference will be added to the total portfolio budget for the following program year, and allocated between programs at The Company’s discretion. The DSMAG will be notified prior to the reallocation of funds between programs or to the reallocation of funds to the following program year.

DATE OF ISSUE December 2, 2016  
ISSUED BY Kelly S. Walters, Vice President, Joplin, MO

DATE EFFECTIVE January 1, 2017

THE EMPIRE DISTRICT ELECTRIC COMPANY

P.S.C. Mo. No. 5 Sec. 4 2nd Revised Sheet No. 8e

Canceling P.S.C. Mo. No. 5 Sec. 4 1st Revised Sheet No. 8e

For ALL TERRITORY

PROMOTIONAL PRACTICES  
SCHEDULE PRO

PROGRAM PORTFOLIO INFORMATION

Empire’s annual budget for its energy efficiency portfolio will be \$1,250,000 per calendar year, which includes five percent for marketing of the programs, and five percent for a comprehensive Evaluation, Measurement, and Verification (“EM&V”) of the programs, as determined by the Stipulation and Agreement approved by the Missouri Public Service Commission (Commission) in Case No. ER-2016-0023. Unspent budgeted allocations may be moved between programs. If the total portfolio expenditures are less than the total portfolio budget in a given year, the difference will be added to the total portfolio budget for the following year, and allocated between programs at Empire’s discretion. The DSMAG will be notified prior to the reallocation of funds between programs or to the reallocation of funds to the following year.

Program Budgets:

Custom C&I Program (see Sheets 8a and 8a1 for details):

Program Year	Budget
2017	\$800,000
2018	\$800,000

Income-Eligible Multi-Family Direct Install (see Sheet 8c1 for program details)

Program Year	Budget
2017	\$100,000
2018	\$100,000

Multi-Family Direct Install (see Sheet 8c2 for program details)

Program Year	Budget
2017	\$100,000
2018	\$100,000

Residential HVAC Program (see Sheet 8d for program details)

Program Year	Budget
2017	\$250,000
2018	\$250,000

Annual Energy Savings Targets (kWh):

	2017	2018	Total
Custom C&I Program	5,600,000	5,600,000	11,200,000
Income-Eligible Multi-Family Direct Install	415,612	415,612	831,224
Multi-Family Direct Install	415,612	415,612	831,224
Residential HVAC Program	363,668	363,668	727,336
Total	6,794,892	6,794,892	13,589,784

DATE OF ISSUE December 2, 2016  
ISSUED BY Kelly S. Walters, Vice President, Joplin, MO

DATE EFFECTIVE January 1, 2017

THE EMPIRE DISTRICT ELECTRIC COMPANY

P.S.C. Mo. No. 5 Sec. 4 2nd Revised Sheet No. 8f

Canceling P.S.C. Mo. No. 5 Sec. 4 1st Revised Sheet No. 8f

For ALL TERRITORY

PROMOTIONAL PRACTICES SCHEDULE PRO
---------------------------------------

RESERVED FOR FUTURE USE

---

DATE OF ISSUE December 2, 2016  
ISSUED BY Kelly S. Walters, Vice President, Joplin, MO

DATE EFFECTIVE January 1, 2017

THE EMPIRE DISTRICT ELECTRIC COMPANY

P.S.C. Mo. No. 5 Sec. 4 2nd Revised Sheet No. 8g

Canceling P.S.C. Mo. No. 5 Sec. 4 1st Revised Sheet No. 8g

For ALL TERRITORY

PROMOTIONAL PRACTICES SCHEDULE PRO
---------------------------------------

RESERVED FOR FUTURE USE

THE EMPIRE DISTRICT ELECTRIC COMPANY

P.S.C. Mo. No. 5 Sec. 4 2nd Revised Sheet No. 8h

Canceling P.S.C. Mo. No. 5 Sec. 4 1st Revised Sheet No. 8h

For ALL TERRITORY

PROMOTIONAL PRACTICES SCHEDULE PRO
---------------------------------------

RESERVED FOR FUTURE USE

THE EMPIRE DISTRICT ELECTRIC COMPANY

P.S.C. Mo. No. 5 Sec. 4 1st Revised Sheet No. 8i

Canceling P.S.C. Mo. No. 5 Sec. 4 Original Sheet No. 8i

For ALL TERRITORY

PROMOTIONAL PRACTICES SCHEDULE PRO
---------------------------------------

RESERVED FOR FUTURE USE

---

DATE OF ISSUE December 2, 2016  
ISSUED BY Kelly S. Walters, Vice President, Joplin, MO

DATE EFFECTIVE January 1, 2017

THE EMPIRE DISTRICT ELECTRIC COMPANY

P.S.C. Mo. No. 5 Sec. 4 2nd Revised Sheet No. 8j

Canceling P.S.C. Mo. No. 5 Sec. 4 1st Revised Sheet No. 8j

For ALL TERRITORY

PROMOTIONAL PRACTICES SCHEDULE PRO
---------------------------------------

RESERVED FOR FUTURE USE