

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

William L. Gehrs, Jr.,)	
)	
Complainant,)	
)	
vs.)	File No. EC-2018-0033
)	
The Empire District Electric Company,)	
)	
Respondent.)	

RESPONSE TO DISCOVERY MOTION

COMES NOW the Respondent, The Empire District Electric Company (“Empire” or the “Company”), pursuant to the *Order Directing Filing* issued herein on November 14, 2017, and respectfully states as follows to the Missouri Public Service Commission (“Commission”):

1. The Complainant, pro se, has submitted various requests for information regarding other Empire customers. Empire provided all responsive information possible, without providing personal details regarding other customers. At this point, Mr. Gehrs is requesting the following additional information:
 - a. The property addresses for other Empire customers with multi-unit properties without separate meters;
 - b. The property address of a particular Empire customer who did not allow Empire access to the property to determine the number of units; and
 - c. Details regarding Empire’s contacts with a particular Empire customer with a multi-unit property without separate meters.
2. As set forth in Empire’s Response to Commission Order filed herein on October 10, 2017, Empire began investigating properties owned by other Empire customers in response to concerns raised Mr. Gehrs in the course of discovery in this proceeding. As a result, Empire

changed how it bills one of these customers (to the manner in which Mr. Gehrs was already being billed), Empire determined that some of the properties referenced by Mr. Gehrs were already being billed properly (in the manner that Empire bills Mr. Gehrs), and Empire determined that billing for one of the referenced properties may need to be changed (to the manner in which Empire bills Mr. Gehrs).

3. Empire believes the additional information being requested by the Complainant at this time is not relevant to this proceeding, as it has no bearing on the allegations set forth in the Complaint filed herein.
4. Also, the additional information being requested by Complainant regarding other Empire customers is customer-specific and should be treated as confidential under the Commission's rules and Empire's policies.
5. If the Commission believes the additional information being requested is relevant to the proceeding and should be provided to the Complainant, Empire will do so upon order of the Commission. Empire believes it would be inappropriate to provide the requested customer-specific information to a pro se Complainant absent a Commission order compelling production.

WHEREFORE, Empire submits this Response to Discovery Motion. Empire requests such relief as is just and proper under the circumstances.

Respectfully submitted,

BRYDON, SWEARENGEN & ENGLAND, P.C.

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed in EFIS on this 21st day of November, 2017, with notification sent to all parties. I further certify that a copy was sent by U.S. mail, postage prepaid, to the Complainant.

/s/ Diana C. Carter