

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

In the Matter of The Empire District Gas)
Company's d/b/a Liberty Request to File) **File No. GR-2021-0320**
Tariffs to Change its Rates for Natural Gas)
Service)

**STAFF RESPONSE TO EMPIRE GAS' TEST YEAR
AND UPDATE PERIOD PROPOSAL**

COMES NOW Staff of the Missouri Public Service Commission, by and through the undersigned counsel, and for its *Staff Response to Empire Gas' Test Year and Update Period Proposal* respectfully states as follows:

1. As stated in the Commission's *Order Giving Notice, Setting a Deadline to Intervene, Setting a Deadline to Respond to the Test Year, and Directing a Proposed Schedule* ("Order") issued on August 24, 2021, "Empire Gas proposes a test year of the twelve months ending December 31, 2020, with a proposed true up through September 30, 2021."¹

2. The Order further provided that "[a]ny party wishing to respond to Empire Gas' proposed test year shall do so no later than October 4, 2021" and that "[n]o later than October 12, 2021, the parties shall submit a joint proposed procedural schedule as described in this order. The Staff of the Commission shall coordinate and file the joint proposed procedural schedule."

3. Staff does not oppose the 12-months ending December 31, 2020, test year with an update period through September 30, 2021, as proposed by Empire Gas in the

¹ Empire Gas has not proposed, nor requested, a true up period in this matter. As noted in the Direct Testimony of Empire Gas witness Michael D. Beatty, p. 14, Ins. 9-12, Empire Gas used a 12-month test year ending December 31, 2020, to develop its case and proposes an update period through September 30, 2021, to reflect known and measurable changes.

Direct Testimony of Michael D. Beatty **so long as** (1) the Commission adopts a procedural schedule for these proceedings approximating the proposed schedule to be filed by Staff on October 12, 2021, **and** (2) any procedural order the Commission would issue in this matter reserves the right for any party to request a true up period at a later date if the audit and evidence justify one.

WHEREFORE, Staff respectfully submits this *Staff Response to Empire Gas' Test Year and Update Period Proposal*.

Respectfully submitted,

/s/ Jamie S. Myers

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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 this 1st day of October, 2021.

/s/ Jamie S. Myers