

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

In the Matter of The Empire)	
District Electric Company's Request)	Case No. ER-2016-0023
For Authority to Implement a General)	
Rate Increase for Electric Service)	

POSITION STATEMENT OF THE CITY OF JOPLIN

The City of Joplin takes a position only on the issues designated below. For its Position Statement, Joplin states:

1. *Regulatory Policy*

The Commission should design rates in a way that is just, reasonable and fair to the utility's customers. As the Commission stated in WR-2011-0337 (Order Approving Non-Unanimous Stipulation and Agreement, March 7, 2012), "[t]he Commission's guiding purpose in setting rates is to protect the consumer against the natural monopoly of the public utility[.]"

17. *Class Cost of Service and Rate Design:*

A. *What, if any, revenue neutral interclass shifts are supported by Class Cost of Service studies?*

None. As the Commission stated in its Report and Order in ER-2014-0341: "Attempting to completely eradicate the...residential rate class discrepancy...would be too punitive to the customers in that class."

B. *What, if any, revenue neutral interclass shifts should be made in designing the rates resulting from this case?*

The residential class has endured substantial increases in both electric and water rates. Any additional interclass shifts to residential customers would be unfair and unreasonable.

C. *What, if any, changes to the residential customer charge are supported by Class Cost of Service studies?*

None.

D. *What, if any, changes to the residential customer charge should be made in designing the rates resulting from this case?*

The residential class has endured substantial increases in both electric and water rates. Any increase in the residential customer charge unfairly and unreasonably burdens low-income and fixed-income residents. And, as the Commission noted in its Report and Order in ER-2014-0341, “Shifting customer costs from variable volumetric rates—that a customer can reduce through energy efficiency—to fixed customer charge will reduce incentive efforts to conserve energy.”

E. *How should revenue requirement related to energy efficiency programs be allocated to the customer classes?*

Energy efficiency programs should be allocated to the customer classes in which those programs are offered and utilized.

F. *How should any revenue requirement increase be implemented in this case?*

Any revenue requirement increase should be an increase across-the-board for each class on an equal percentage basis.

G. *Should the Commission open a working docket so the parties to this case can discuss the implementation of revised block rate designs for Empire’s residential customers?*

Yes.

H. *What, if any, changes to the General Power, SC-P and Large Power customer, demand and energy rate elements should be made in designing the rates resulting from this case?*

Rate components should increase by the same percentage as the overall increase to the rate classes.

The City of Joplin does not take a position on any other issue at this time, but reserves the right to do so as additional evidence is presented to the Commission.

WHEREFORE, the City of Joplin respectfully submits its Statement of Position.

Respectfully submitted,

BLITZ, BARDGETT & DEUTSCH, L.C.

By: /s/ Stephanie S. Bell
Marc H. Ellinger, #40828
Stephanie S. Bell, #61855
308 East High Street
Suite 301
Jefferson City, MO 65101
Telephone No.: (573) 634-2500
Facsimile No.: (573) 634-3358
E-mail: mellinger@bbdlc.com
E-mail: sbell@bbdlc.com

CERTIFICATE OF SERVICE

I hereby certify that true copies of the foregoing were sent by email this 20th day of May, 2016, to the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

/s/ Stephanie S. Bell
Stephanie S. Bell