

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

In the Matter of the Petition of The Empire District )  
Electric Company d/b/a Liberty to Obtain a )  
Financing Order that Authorizes the Issuance of ) Case No. EO-2022-0040  
Securitized Utility Tariff Bonds for )  
Qualified Extraordinary Costs )

In the Matter of the Petition of The Empire District )  
Electric Company d/b/a Liberty to Obtain a )  
Financing Order that Authorizes the Issuance of ) Case No. EO-2022-0193  
Securitized Utility Tariff Bonds for Energy )  
Transition Costs Related to the Asbury Plant )

**MECG STATEMENT OF POSITION**

COMES NOW, the Midwest Energy Consumers Group, (“MECG”) and submits its statement of position:

1) What amounts should the Commission authorize Liberty to finance using securitized utility tariff bonds?

**Position:**

MECG did not file testimony on the figures to be included in a securitized bond but reserves the right to base a final position on the evidence presented at hearing. MECG supports the approval of securitized utility tariff bonds only to the extent that there are quantifiable present value benefits of securitizing the costs compared to traditional ratemaking.

2) Storm Uri

**Position:**

MECG did not file testimony on the figures to be included in a securitized bond but reserves the right to base a final position on the evidence presented at hearing. MECG supports the approval of securitized utility tariff bonds only to the extent that there are quantifiable present value benefits of securitizing the costs compared to traditional ratemaking.

3) Asbury

**Position:**

MECG did not file testimony on the figures to be included in a securitized bond but reserves the right to base a final position on the evidence presented at hearing. MECG supports the approval of securitized utility tariff bonds only to the extent that there are quantifiable present value benefits of securitizing the costs compared to traditional ratemaking.

- 4) What are the estimated upfront and ongoing financing costs associated with securitizing qualified extraordinary costs associated with Winter Storm Uri and the energy transition costs associated with Asbury?

**Position:**

MECG did not file testimony on the figures to be included in a securitized bond but reserves the right to base a final position on the evidence presented at hearing.

- 5) Would issuance of securitized utility tariff bonds and imposition of securitized utility tariff charges provide quantifiable net present value benefits to customers as compared to recovery of the securitized utility tariff costs that would be incurred absent the issuance of bonds?

**Position:**

MECG did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

- 6) Regarding any designated staff representatives, who may be advised by a financial advisor or advisors, what provisions or procedures should the Commission order to implement the requirements of Section 393.1700.2(3)(h)?

**Position:**

MECG supports the Staff's position on the issue.

- 7) What other conditions, if any, are appropriate and not inconsistent with Section 393.1700, RSMo (Supp. 2021), to be included in the financing order?

**Position:**

MECG did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

WHEREFORE, MECG respectfully submits its statement of positions.

Respectfully,

**/s/ Tim Opitz**

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ATTORNEY FOR MIDWEST  
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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 6<sup>th</sup> day of June 2022:

**/s/ Tim Opitz**

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