

**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)

LIBERTY’S STATEMENT OF POSITION AS TO ADDITIONAL ISSUE 8

COMES NOW The Empire District Electric Company d/b/a Liberty (“Liberty” or the “Company”) and, in response to the Staff Motion For Leave to File Out of Time Issue and Position Statement, states as follows to the Missouri Public Service Commission (“Commission”):

- 8) How should securitized utility tariff charges be initially allocated among retail customer classes?

Liberty’s primary interest is that the Financing Order, including the class allocation, be in accordance with the Securitization Statute. The Company otherwise does not take a position on this issue.

Section 393.1700.2(3)(c)h, RSMo.;
Hall Dir. (EO-2022-0040), pp. 12-13;
Emery Dir. (EO-2022-0193), pp. 22-23;
Emery Surreb., pp. 39-40.

WHEREFORE, The Empire District Electric Company d/b/a Liberty respectfully submits this Statement of Position as to Additional Issue 8 and requests the issuance of a Financing Order authorizing Liberty to finance \$362,419,908 using securitized utility tariff bonds.

Respectfully submitted,

**ATTORNEYS FOR THE EMPIRE DISTRICT
ELECTRIC COMPANY D/B/A LIBERTY**

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CERTIFICATE OF SERVICE

I hereby certify that the above document was filed in EFIS on this 12th day of June, 2022,
and sent by electronic transmission to all counsel of record.

/s/ Diana C. Carter