

6. This filing also reflects adjustments to EDG's ACA factors. Staff's Procurement Analysis Department (PAD) will review EDG's ACA filing and may recommend adjustments to the ACA account balance(s). Due to the limited time available to review the documentation supporting the ACA factors in this filing, the PAD requests permission to submit its results and recommendations regarding the information included in this ACA filing to the Commission by December 15, 2020.

7. Case No. GR-2020-0124, under which these changes were filed, was established to track EDG's PGA factors to be reviewed in its 2018-2019 ACA filing. Case No. GR-2019-0124 was established to track the EDG's PGA factors to be reviewed in its 2017-2018 ACA filing. Any rate change implemented pursuant to this tariff filing should be implemented on an interim basis, subject to refund, pending final Commission decisions in Case Nos. GR-2020-0124 and GR-2019-0124.

8. As explained in the Staff Recommendation in the accompanying Memorandum attached as Appendix A, which is incorporated herein by reference, Staff reviewed the current filing and determined that it was calculated in conformance with EDG's PGA clause. EDG filed its tariff sheets on November 4, 2019 to be effective December 4, 2019, allowing thirty (30) days notice for its PGA change. Therefore, Staff recommends the Commission approve the tariff sheets on an interim basis, subject to refund status pending final Commission decisions in Case Nos. GR-2020-0124 and GR-2019-0124.

9. Staff also recommends the Commission order PAD Staff to file the results of its review of the ACA factors represented in this filing no later than December 15, 2020.

10. Staff verified that EDG filed its annual report and is not delinquent on its PSC assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing except as noted herein.

WHEREFORE, Staff recommends the Commission issue an order approving the following tariff sheets to become effective December 4, 2019, on an interim basis, subject to refund pending final Commission decisions in Case Nos. GR-2020-0124 and GR-2019-0124, and that the Commission order PAD Staff to file the results of its ACA review in this docket by December 15, 2020:

P.S.C. MO. No. 2

15th Revised Sheet No. 62, Cancelling 14th Revised Sheet No. 62

15th Revised Sheet No. 63, Cancelling 14th Revised Sheet No. 63

15th Revised Sheet No. 65, Cancelling 14th Revised Sheet No. 65

Respectfully submitted,

/s/ Karen E. Bretz

Karen E. Bretz

Legal Counsel

Missouri Bar No. 70632

Attorney for the Staff of the

Missouri Public Service Commission

P.O. Box 360

Jefferson City, MO 65102

573-751-5472 (Voice)

573-751-9285 (Fax)

Karen.Bretz@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to all parties and/or counsel of record on this 15th day of November, 2019.

/s/ Karen E. Bretz

MEMORANDUM

TO: Missouri Public Service Commission Official Case File,
Case No. GR-2020-0124, Tariff No. YG-2020-0074
The Empire District Gas Company

FROM: Michael J. Ensrud - Procurement Analysis Department

/s/ David M. Sommerer 11/15/2019 /s/ Karen Bretz 11/15/2019
Financial and Business Analysis Division /Date Staff Counsel's Office/Date

SUBJECT: Staff Recommendation for the Empire District Gas Company Scheduled Winter
PGA Filing - Effective Date December 4, 2019

DATE: November 15, 2019

On November 4, 2019, The Empire District Gas Company, (“Empire,” “EDG” or “Company”), filed three tariff sheets bearing a proposed effective date of December 4, 2019. The tariff sheets were filed to reflect changes in EDG’s Purchased Gas Adjustment (“PGA”) factors as the result of estimated changes in the cost of natural gas for the upcoming winter season and changes in the Actual Cost Adjustment (“ACA”) factors. The proposed effective date is December 4, 2019.

On November 5, 2019 the Commission issued an ORDER DIRECTING EXPEDITED STAFF RECOMMENDATION that establishes a deadline for Staff to submit its memo addressing this pending PGA filing no later than November 15, 2019.

The changes (both reductions and increases) in the Total PGA for each of the three (3) systems, can be summarized as follows:

<u>SYSTEM¹</u>	<u>Proposed</u> <u>Rate</u> <u>Per Ccf</u>	<u>Current</u> <u>Rate</u> <u>Per Ccf</u>	<u>Change</u> <u>Per Ccf</u>
South ²	0.32308	\$0.39846	(\$0.07538)
North ³	0.34649	\$0.45425	(\$0.10776)
Northwest ⁴	0.35092	\$0.33903	\$0.01189

¹ These PGA rates apply to the following classes: RS, SCF, SVF, LVF.

² Territory includes the cities of Clinton, Lexington, Marshall, and Sedalia - served by Southern Star Central Gas Pipeline.

³ Territory includes the cities of Chillicothe, Marceline, and Trenton - served by Panhandle Eastern Pipe Line Company.

⁴ Territory includes the communities of Rockport, Maryville, and Tarkio - served by ANR Pipeline.

Case No. GR-2020-0124, under which these changes were filed, was established to track the Company's PGA factors to be reviewed in its 2018-2019 ACA filing. Case No. GR-2019-0124 was established to track the Company's PGA factors reviewed in its 2017-2018 ACA filing. Any rate change implemented pursuant to this tariff filing should be implemented on an interim basis, subject to refund status pending final Commission decisions in ACA Case Nos. GR-2020-0124 and GR-2019-0124.

Due to the limited time available to review the documentation supporting the ACA factors represented in this filing, the Procurement Analysis Department (PAD) has requested permission to submit its results and recommendations regarding the information included in this ACA filing to the Commission on or before December 15, 2020.

Staff has verified that the Company has filed its annual report and is current on its PSC assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing, other than as mentioned above.

Staff has reviewed this filing and has determined that it was calculated in conformance with EDG's PGA Clause. Empire has chosen a December 4, 2019 effective date.

Therefore, Staff recommends that the Commission issue an order approving the following tariff sheets filed on November 4, 2019, on an interim basis, subject to refund pending final Commission decisions in Case Nos. GR-2020-0124 and GR-2019-0124, effective December 4, 2019 as requested by Empire:

P.S.C. MO No. 2

15th Revised Sheet No. 62, Cancelling 14th Revised Sheet No. 62
15th Revised Sheet No. 63, Cancelling 14th Revised Sheet No. 63
15th Revised Sheet No. 65, Cancelling 14th Revised Sheet No. 65

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

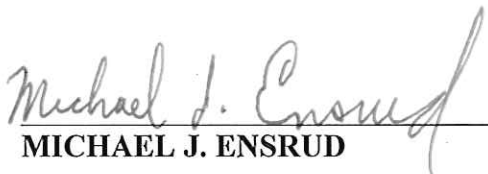
In the Matter of The Empire District Gas)
Company's Purchase Gas Adjustment) Case No. GR-2020-0124
Tariff Filing)

AFFIDAVIT OF MICHAEL J. ENSRUD

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW MICHAEL J. ENSRUD and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation* in Memorandum form; and that the same is true and correct according to his best knowledge and belief.

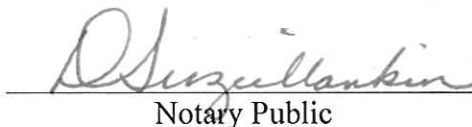
Further the Affiant sayeth not.


MICHAEL J. ENSRUD

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 14th day of November 2019.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: December 12, 2020
Commission Number: 12412070


Notary Public