

**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 ON ISSUE 8

COMES NOW, the Midwest Energy Consumers Group, (“MECG”) and submits its statement of position on Issue 8:

Issue 8: How should securitized utility tariff charges be initially allocated among retail customer classes?

Position:

The securitized costs should be allocated among retail customer classes as proposed in the Company’s direct testimony.¹ This method is consistent with the provisions of the securitization statute that discusses allocation among retail customer classes.²

WHEREFORE, MECG respectfully submits its statement of position on issue 8.

Respectfully,

/s/ Tim Opitz

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¹ Emery Direct, p. 22-23 and Hall Direct, p. 12-13.

² Section 393.1700.2(3)(c)h, RSMo.

ATTORNEY FOR MIDWEST
ENERGY CONSUMERS GROUP

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 13th day of June 2022:

/s/ Tim Opitz
