

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

In the Matter of The Empire District Gas                                 )  
Company’s d/b/a Liberty Request to File Tariffs                     )           **File No. GR-2021-0320**  
to Change its Rates for Natural Gas Service                         )

**Position Statement of Midwest Energy Consumers Group**

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

Issue 1.c

*Should the Commission adopt EDG’s proposal to change current tariff language regarding Empire’s passage of charges on to customers for actions or inactions of their suppliers, marketers or aggregators, or adopt MSBA’s proposal to retain current tariff language until the Commission later reviews outcomes of pending federal court cases and Commission complaints and establishes parameters applicable to all Missouri Gas Corporation tariffs?*

Position:

The Commission should retain the current tariff language until a later time. These tariff changes do not need to be made within this rate case and can be implemented in a later tariff filing. MSBA’s testimony points out the on-going cases where the relationship and responsibilities of marketers/aggregators towards customers and the utility are being examined. In addition, Spire Missouri recently filed a rate case in which it proposes several changes that impact the rights and responsibilities of marketers/aggregators. MSBA argues the proposed changes leave customers liable without holding aggregators/markets accountable. Since these changes do not need to be made within the context of this rate case, the Commission should maintain the current language for Empire while it considers the broader policies related to gas marketers/aggregators throughout Missouri.

Respectfully Submitted,

**/s/ Tim Opitz**

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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 20<sup>th</sup> day of April 2022:

**/s/ Tim Opitz**

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