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

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In the Matter of The Empire District Electric Company for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in the Company's Missouri Service Area

Case No. ER-2014-0351

## EMPIRE'S SECOND MOTION FOR LEAVE TO FILE SUPPLEMENTAL DIRECT TESTIMONY

COMES NOW The Empire District Electric Company ("Empire" or "Company"), by and through the undersigned counsel, and, pursuant to Commission Rule 4 CSR 240-2.130(8), hereby requests leave of the Missouri Public Service Commission ("Commission") to file the Supplemental Direct Testimony of Aaron J. Doll. In support of this request, Empire respectfully states as follows:

1. Empire submitted revised tariffs and supporting testimony and other documentation on August 29, 2014. As part of its initial filing herein, Empire submitted the Direct Testimony of Todd W. Tarter to support, among other things, Empire's proposal to continue its Fuel Adjustment Clause ("FAC"). Empire submitted the Direct Testimony of Dr. James H. Vander Weide on the subjects of Empire's cost of equity and a recommended range of return on equity. Additionally, Empire submitted the Direct Testimony of Aaron J. Doll to support the inclusion of Integrated Marketplace-related charges and transmission related revenue and expense into Empire's FAC.

2. Empire and the Office of the Public Counsel ("OPC") discussed Empire's direct testimony on issues related to Empire's requested continuation of its FAC, and Empire determined that supplemental direct testimony should be filed in order to address concerns raised by OPC. Pursuant to Commission order, the Supplemental Direct Testimony of Todd W. Tarter

and the Supplemental Direct Testimony of Dr. James H. Vander Weide were filed herein on December 10, 2014.

3. Empire and OPC have continued to discuss Empire's direct testimony on issues related to Empire's requested continuation of its FAC, and Empire has determined that the attached Supplemental Direct Testimony of Aaron J. Doll should be filed in order to address concerns raised by OPC.

4. The attached Supplemental Direct Testimony provides schedules mapping both revenues and costs to the proposed FAC, including revenues and costs associated with transmission. The schedules attached to the proposed testimony also provide charge type descriptions and a glossary of terms.

5. The attached Supplemental Direct Testimony does not alter Empire's requested return on equity, does not alter Empire's proposed FAC tariff sheets, and does not impact Empire's requested overall revenue requirement in this case.

6. The granting of this request and the filing of the proposed Supplemental Direct Testimony will not result in any harm to any party hereto and will not cause any delay in the processing of this case.

WHEREFORE, as set forth above, Empire seeks leave of the Commission to file the Supplemental Direct Testimony attached hereto. Empire seeks such other and further relief as the Commission deems just and proper under the circumstances.

Respectfully submitted,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:

/s/ Diana C. Carter Diana C. Carter MBE #50527 BRYDON, SWEARENGEN & ENGLAND P.C.

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## ATTORNEYS FOR THE EMPIRE DISTRICT ELECTRIC COMPANY

## **CERTIFICATE OF SERVICE**

I hereby certify that the above and foregoing document was filed in EFIS and that a copy of the same was sent via electronic mail on this  $22^{nd}$  day of December, 2014, to all counsel of record.

/s/ Diana C. Carter\_\_\_\_