

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

In the Matter of Liberty Utilities’ Motion for )  
Temporary Variances Regarding Electric, Gas, ) Case No. AO-2020-0335  
Water, and Sewer Tariffs and the Impact of )  
COVID-19 on Missouri Customers )

**NOTICE REGARDING CHANGE IN PRACTICES**

COME NOW The Empire District Electric Company (“EDE”), The Empire District Gas Company (“EDG”), Liberty Utilities (Missouri Water) LLC (“Liberty Water”), and Liberty Utilities (Midstates Natural Gas) Corp. (“Midstates”), all Liberty Utilities companies (collectively, the “Applicants”), and for their Notice Regarding Change in Practices, respectfully state as follows to the Missouri Public Service Commission (“Commission”):

1. As of March 16, 2020, for all customers, the Applicants have been foregoing the collection of fees related to late payments, have not been disconnecting customers due to nonpayment, and have not been sending collection or disconnection notices. By motion submitted April 23, 2020, and to the extent required, the Applicants sought temporary variances from their tariffs and the Commission’s rules in order to allow these practices to continue.

2. On May 13, 2020, the Commission issued its *Order Approving Motion for Variance*, effective May 23, 2020 (the “*Approval Order*”).

3. Ordered paragraph two of the *Approval Order* provides that the “temporary waivers will remain in place until Liberty Utilities determines that the emergency has passed and chooses to terminate the temporary waivers.” Ordered paragraph three then provides that “Liberty Utilities shall notify the Commission 30 days before the temporary waivers are terminated.”

4. During the COVID-19 emergency, the Applicants have been sending emails and bill messages and making Facebook posts encouraging customers to continue to pay toward past due balances and encouraging customers to call if they need to make payment arrangements. The

Applicants also have been providing customers with energy assistance information, and the credit and collection team has been sending reminder notices to customers with past due balances. The Applicants also contacted the energy assistance agencies, and the Project Help program made changes to program guidelines to allow for more customers to receive assistance from the program during the COVID-19 emergency.

5. Additionally, the Applicants' parent company, Algonquin Power & Utilities Corp., pledged \$500,000 to support communities in their service territories as a result of the COVID-19 emergency, with \$128,000 earmarked for Missouri. For the Applicants, this breaks down to \$60,000 for utility bill assistance by community action agencies, \$45,000 for employee-selected organizations and charities that support our customers and the communities we serve, and \$23,000 for the customer service representative goodwill program. For this last component, each Missouri customer service/contact center representative was allotted \$250 to credit the bills of customers impacted by the COVID-19 emergency.

6. At this time, and pursuant to ordered paragraphs two and three of the *Approval Order*, the Applicants provide notice of their intention to return to regular practices with regard to non-pay disconnects, late payment fees, and collections, as specified below.

7. Beginning July 16, 2020, the Applicants will be sending shut-off notices, charging late fees, sending collection notices, and working disconnects. Practices will not return to normal all at once, however. From July 16, 2020, to September 15, 2020, the Applicants will use a higher threshold for collection calls and will send two additional reminder letters to customers to give them an additional 60 days to pay or make payment arrangements before a balance is turned over to collections.

8. Additionally, the Applicants will continue to work with customers to come current on their utility bills. For residential customers, the Applicants will offer a 12-month payment plan

for past due balances. For commercial and industrial customers, the Applicants will offer two options: (1) 33% down and three installments, or (2) 50% down and six installments. If a payment plan is entered into and followed, service will not be disconnected. There will also be no late fees or interest charged if the customer makes payments pursuant to the agreement.

9. With regard to EDE's low-income pilot program, EDE will return to normal practices under the tariff on September 15, 2020.

WHEREFORE, the Applicants submit this Notice Regarding Change in Practices. No action on the part of the Commission is requested at this time.

/s/ Diana C. Carter  
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**CERTIFICATE OF SERVICE**

I hereby certify that the above document was filed in EFIS on this 15<sup>th</sup> day of June, with notice of the same sent to all counsel of record.

/s/ Diana C. Carter