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Exhibit No.

**Issue: Fuel & Purchased Power Expense;
Interim Energy Charge**

Witness: Brad P. Beecher

Type of Exhibit: Rebuttal Testimony

Sponsoring Party: Empire District

Case No. ER-2002-424

Date Testimony Prepared: 9/24/02

**Before the Public Service Commission
of the State of Missouri**

Rebuttal Testimony

Of

Brad P. Beecher

September 24, 2002

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BRAD P. BEECHER

THE EMPIRE DISTRICT ELECTRIC COMPANY

CASE NO. ER-2002-424

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REBUTTAL TESTIMONY
OF
BRAD P. BEECHER
THE EMPIRE DISTRICT ELECTRIC COMPANY
BEFORE
THE MISSOURI PUBLIC SERVICE COMMISSION
CASE NO. ER-2002-424

1 **I. Introduction**

2 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

3 A. Brad P. Beecher. My business address is 602 Joplin Street, Joplin, Missouri.

4 Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

5 A. The Empire District Electric Company ("Empire" or "Company"). I am Vice President -
6 Energy Supply.

7 Q. DID YOU FILE DIRECT AND SUPPLEMENTAL DIRECT TESTIMONY IN THIS
8 CASE?

9 A. Yes, I did.

10 Q. WHAT IS THE PURPOSE OF THIS TESTIMONY?

11 A. The purpose of this testimony is two-fold. First, in Section II, in accordance with the
12 Procedural Schedule issued in this case, I will provide an update to Empire's Fuel and
13 Purchased Power ("F&PP") filing reflecting changes from twelve months ending December
14 31, 2001, to June 30, 2002. Second, I will provide testimony rebutting Staff Witness Mr.
15 David Elliott's direct testimony on F&PP in this case and Graham Vesely's direct testimony
16 on natural gas cost inputs.

17 Q. WHAT IS THE CURRENT F&PP EXPENSE POSITIONS OF THE STAFF AND
18 EMPIRE?

19 A. Schedule BPB-1 provides a comparison of on-system expenses for Empire's filed position,
20 Empire's updated position, Staff's filed position (Run 127), and Staff's Run 128 that was

created as a result of the pre-hearing conference. The total on-system costs are summarized in the table below.

Table 1

Empire Filed	Empire Updated	Staff Filed (127)	Staff Updated (128)
\$90,070,244	\$88,069,402	\$84,445,016	\$84,952,361

As a result, the current difference between Empire's updated costs and Staff's updated costs is \$3,117,041. This amount represents approximately \$2.5 million on a Missouri jurisdictional basis.

Q. WILL YOU PLEASE SUMMARIZE THE MAIN POINTS THAT WILL BE ADDRESSED IN THIS TESTIMONY?

A. In this testimony I will compare and contrast Empire's filed F&PP position, Staff's filed F&PP position, and Empire's updated F&PP position. The most distinct differences between Staff's filing and Empire's updated position lie in the following three areas.

1. Spot market purchased power availability
2. Natural gas pricing
3. Natural gas transportation charges

These differences result in significantly understated total costs for F&PP in the Staff's model runs. I will present evidence to the Commission that the quantity of spot market purchased power utilized by Staff Witness Mr. Elliott are overly optimistic and do not correspond with Empire's historical operation. In addition, Staff is recommending gas costs based on historical twelve-month ending ("TME") June 30, 2002 prices instead of utilizing the known and measurable prices that Empire has already secured through its hedging program.

II. Update of On-System Energy Level of Expense

Q. WHAT IS THE UPDATED LEVEL OF EXPENSE FOR ON-SYSTEM F&PP THAT EMPIRE IS RECOMMENDING IN THIS CASE?

A. Empire recommends \$88,069,402 without demand charges (\$104,783,394 with demand charges) total Company for on-system F&PP expense for the projected energy requirements of 4,867,833 MWh. On a unitized basis without demand charges, expenses are predicted to be \$18.09/MWh. This compares to an actual unitized cost without demand charges of \$19.92/MWh for the calendar year 2001 and \$18.94/MWh for twelve months ended June 30, 2002.

Table 2

Actual TME 12/31/01	Actual TME 6/30/02	Staff Filed (127)	Staff Updated (128)	EDE Updated	EDE Filed
19.92	18.94	17.35	17.45	18.09	18.37

Schedule BPB-2 provides a graphical comparison between actual twelve-month ending costs on a unitized basis without demand charges against Empire's filed position, Empire's updated position, Staff's filed position (Run 127), and Staff's Run 128

Q. WHAT UPDATES AND/OR REVISIONS DID EMPIRE MAKE IN ITS UPDATED MODEL RUN?

A. Empire made the following updates to effectuate the changes between test year ended December 31, 2001, and June 30, 2002, and to effectuate changes due to discussion with Staff during the pre-hearing conference.

1. Empire updated the cost of coal to represent actual coal and freight costs contractually effective as of June 30, 2002. Empire's inputs are now nominally equal to the Staff's model inputs.

2. Empire updated its natural gas prices to reflect our known and measurable costs for calendar year 2003. As of July 1, 2002, Empire had 9,300,000 MMBtu of natural gas contractual commitments for 2003 at an average commodity cost of \$3.37/MMBtu. Our gas costs were updated from an average price of \$2.94/MMBtu in our original filing that was based on hedged 2002 pricing. Hedged costs for 2003 are appropriate because the rates in this case most likely will not be effective until 2003 and they are known and measurable as a result of the contractual commitments. Empire's gas position report as of July 1, 2002, is attached as Schedule BPB-3.
3. Empire updated the modeling methodology for SLCC. In Empire's original filing, SLCC was modeled as a single unit. After reading the direct testimony of Mr. Elliott, changes were made to reflect the existence of two combustion turbines and to update the heat rate for the unit based on a year's worth of actual operating data.
4. Empire updated both the spot purchase power costs and spot purchased power availability. Due to changing gas prices, transmission constraints, and overall changes in the wholesale market, it was necessary to update the inputs to produce results more representative of the then current market. In addition, the actual costs for the Jeffrey Energy purchase were less than Empire's original estimate. These costs were reduced from \$13.50/MWh in Empire's original filing to \$12.50/MWh in Empire's revised filing.
5. Empire removed the undistributed and other costs from its ProSym model run and included them as an add-on outside the model to calculate Empire's total costs (See BPB-1). This change was made to more clearly define the differences between the Staff and Empire's model runs and to try to avoid either the duplication or omission of these costs.

1 6. Empire included Gas Supply Realignment ("GSR") charges of \$267,333 assessed by
2 Williams Gas Pipeline Central ("Williams") that were omitted from the original
3 filing. GSR charges are essentially stranded costs that the Federal Energy Regulatory
4 Commission ("FERC") allowed pipeline companies to bill their then existing
5 customers. Empire has no discretion as to whether we pay the charges or not because
6 they are FERC authorized. Additionally, Empire included commodity related
7 (variable) charges for the delivery of natural gas of \$327,023 that were not included
8 in the original filing.

9 Paper copies of our input data files and summaries of the output are included as Schedule BPB-4.

10 **III. Rebuttal of Staff Witness Mr. David Elliott's F&PP Expense**

11 Q. WILL YOU PLEASE SUMMARIZE YOUR POSITION RELATING TO THE STAFF'S
12 F&PP RUN AS FILED IN THIS CASE?

- 13 1. The Staff's total test year cost for F&PP on a unitized basis is so much lower than
14 actual 2001 costs and twelve months ending June 2002 costs as to cast serious doubt
15 on the validity of Staff's modeling. See Table 2 and Schedule BPB-2.
- 16 2. The natural gas price utilized in the Staff's fuel run is not representative of Empire's
17 currently hedged position. In essence, by utilizing historical gas prices and ignoring
18 our known and measurable contracts, Staff is disallowing our prudently incurred costs
19 without presenting any evidence that the contracts were entered into imprudently.
- 20 3. The Staff failed to include a proper amount for the GSR charges assessed by FERC.
- 21 4. The Staff's filed F&PP computer model outputs produce an unrealistic and
22 unwarranted number of start-ups on many of Empire's generating units. When trying
23 to fix this problem during pre-hearing, the Staff's RealTime computer model
24 produced illogical results.

5. The Staff's F&PP model predicts overly optimistic non-contract purchased power cost and availability.

Q. WHAT IS THE FIRST THING YOU USUALLY DO AS A FIRST ASSESSMENT OF F&PP MODELING?

A. In my experience over the past 14 years I have found that it is always appropriate to look at the overall result of a model as a first test to see if the model is creating realistic results. On a unitized basis without demand charges, Empire's actual costs were \$19.92/MWh for the calendar year 2001 and \$18.94/MWh for twelve-months ended June 30, 2002. This compares to Staff's filed position (Run 127) at \$17.33/MWh, Staff's Run 128 at \$17.45/MWh, Empire's original filing at \$18.37/MWh and Empire's update of \$18.09/MWh.

Schedule BPB-1 and Table 3 below provide a comparison of total Company F&PP costs (on-system and off-system) for Empire's filed position, Empire's updated position, Staff's filed position (Run 127), and Staff's Run 128 that was created during the pre-hearing conference.

Table 3

Actual 12/31/01	Empire Filed	Empire Updated	Staff Filed (127)	Staff Updated (128)
\$118,907,322	\$109,141,060	\$111,305,671	\$107,740,432	\$108,247,777

In this particular instance, the costs recommended by both Empire and Staff are well below actually experienced twelve-month ending costs. As an initial assessment of reasonableness, I would want to examine both Empire's and Staff's model runs to determine the reason(s) for the decline in costs.

This understatement of predicted costs in comparison to actual costs is particularly disconcerting given the volatility of the natural gas market, the volatility of the wholesale

1 power market, transmission constraints, and the fact that current law in Missouri does not
2 allow for a fuel cost adjustment provision. As a result, if a particular cost of serving
3 customers, say non-contract purchased power, is arbitrarily assumed to be too low in the
4 setting of rates for Empire's Missouri customers, then the risk of the assumed price falls
5 squarely on Empire's shareholders.

6 Understandably, there will be differences between actual and modeled expenses due to
7 normal weather, unit outages, updated fuel prices, and updated contract purchased power
8 prices. However, a difference of this magnitude should cause all parties great concern and
9 should force all parties to look in detail at the assumptions driving the results. As Empire
10 witness Jill Tietjen will testify, Staff's methodology for determining the availability of non-
11 contract purchased power is the underlying flaw in Staff's model results.

12 Q. WHAT GAS PRICING DID STAFF UTILIZE IN THEIR MODELING?

13 A. According to Staff Witness Graham Vesely, the Staff utilized a gas price based on twelve
14 months ended June 30, 2002, of \$3.29/MMBtu. The Staff's approach in its direct testimony
15 guarantees that Empire will not recover its actual fuel costs for natural gas.

16 Since the last case, Empire has implemented an Energy Risk Management Policy
17 attached as Schedule BPB-5 and added employees who specifically focus their efforts on the
18 purchasing and hedging of power and natural gas. It is essentially the operating manual for
19 our purchasing decisions and is designed to ensure that prudent decisions are made. In
20 general, the Energy Risk Management Policy brings more sophistication and discipline to
21 our fuel procurement. The Energy Risk Management Policy sets targets as to how much
22 natural gas Empire must have hedged at any point in time. Empire had 9,300,000 MMBtu of
23 natural gas commitments for 2003 at an average commodity cost of \$3.37/MMBtu
24 compared to the Staff's inclusion of \$3.29/MMBtu. While on the surface this appears pretty

1 close, the difference to Empire represents \$723,073 total company (\$585,000 Missouri
2 jurisdictional), which are significant expenses to a company Empire's size.

3 The other disconcerting fact that has continued since at least the mid-1990's is Staff's
4 ever-changing basis for establishing natural gas costs. I have been directly involved in cases
5 where the Staff has recommended the twelve-month ending cost, or if the twelve-month
6 ending cost didn't suit their needs they supported a three-year historical average. As
7 outlined above, Empire contends that the known and measurable contractual commitments
8 Empire has made should be included as the cost basis.

9 Q. HAVE YOU HAD DISCUSSIONS WITH STAFF RELATIVE TO NATURAL GAS
10 TRANSPORTATION CHARGES?

11 A. Empire has had open discussions during and after pre-hearing with Staff Witness Graham
12 Vesely regarding losses on the Williams pipeline, GSR charges, and the calculation of
13 variable commodity charges. Empire is still in disagreement with Staff on their GSR
14 position and still unclear on how Staff is calculating the losses and variable commodity
15 charges.

16 Q. WHAT CHARGES ARE APPROPRIATE TO INCLUDE FOR LOSSES AND VARIABLE
17 COMMODITY CHARGES?

18 A. As stated earlier, we have had open discussions with Staff attempting to calculate the
19 appropriate expenses. Attached, as Schedule BPB-6 is an actual bill from Williams. The
20 commodity charges are marked with a capital letter A. When these are applied to the gas
21 usage in the Staff's Run 128 a total commodity charge of \$259,998 is the result.

22 Also on this bill, marked with capital letter B, it can be seen that Empire is charged for
23 losses on the William's pipeline. Attached, as Schedule BPB-6 is the portion of the

Williams tariff that supports the charges. The loss percentages are marked with capital letter C. Losses charges on Staff Run 128 should total \$704,752.

The total cost of the variable commodity charges and the loss charges should equal \$964,750 but only \$864,326 was included in a revised Summary of F&PP Expense worksheet supplied by Staff and included as part of Staff Run 128.

Q. WHAT IS THE ISSUE WITH GSR CHARGES?

A. GSR charges are costs that the Federal Energy Regulatory Commission ("FERC") allowed pipeline companies to assess to their then existing customers. The total amount of GSR charges due from Empire was set by FERC. Attached, as Schedule BPB-7 is a copy of a bill that we receive on a monthly basis for GSR charges. As can be seen on the bill, the remaining balance due Williams for GSR charges as of August 1, 2002, was \$135,000. Originally, Staff completely omitted GSR charges from their calculation. After discussions at pre-hearing conference Staff appears to have included \$135,000 of the \$267,333 actual charges in the test year. On one hand the Staff argues that twelve-month ending prices are the only gas prices appropriate (\$3.29/MMBtu) and on the other hand, they choose to ignore actual test year charges of \$267,333 because our obligation to pay the GSR charges will expire at a future date. This is wholly inconsistent.

Q. DID YOU SEE ANYTHING IN THE OUTPUT OF STAFF'S MODEL RUNS THAT EXPLAINED STAFF'S LOW OVERALL EXPENSE RECOMENDATION?

A. Yes, a couple of things. In Staff's filed position (Run 127), Staff's computer model results call for start-ups and stops on the 52-year-old Riverton 7 coal unit a total of 243 times (16 cold and 227 hot) and 183 times (7 cold and 116 hot) for 48-year-old Riverton 8 coal unit. These units haven't experienced more than a dozen starts a year in actual operations since the early 1990's. Schedule BPB-9 lists actual starts on these units each year since 1997.

Staff agreed that this mode of operation was not logical for these units and made a change in the RealTime model to fix the excessive starts. Unfortunately, the RealTime model produced unpredictable and illogical results.

Q. EXPLAIN WHAT YOU MEAN BY UNPREDICTABLE AND ILLOGICAL RESULTS.

A. The RealTime model was allowed to simulate Empire's system and produce the most economical output. In the Staff's filed simulation, the most economical solution RealTime could find included the unrealistic cycling of units 7 and 8. When Staff tried to correct the unrealistic number of starts on units 7 and 8, making units 7 and 8 "must run" in the computer model, the predicted expenses "reduced" \$811,000. This is completely illogical since the most economical dispatching scenario (making units 7 & 8 "must run") should have been the most economical to begin with. The computer model could have chosen to make units 7 and 8 "must run" on its own in its original "most economical" run.

Q. WHAT OTHER AREAS OF CONCERN DID YOU HAVE WITH THE STAFF'S MODEL?

A. The other main concern I had with Staff's modeling was the pricing and availability of spot market purchase power and transmission. Empire witness Jill Tietjen will cover these topics in great detail. Schedules BPB-10 through BPB-22 present some of the data that describes my concerns with the Staff's modeling of spot purchase power. Either myself or someone under my direct supervision created all schedules included in my testimony. Schedules BPB-10 through BPB-22 are also presented in the rebuttal testimony of Jill Tietjen as Schedules JST-1 through JST-13.

IV. Summary

Q. PLEASE PROVIDE A SUMMARY OF YOUR TESTIMONY.

1 A. Differences between Staff's filed position (Run 127), Staff Run 128, Empire's original filed
2 position, and Empire's updated position are reflected in Schedule BPB-1. There is currently
3 about a \$3.1 million dollar total company (\$2.5 million Missouri jurisdictional) difference
4 between Empire's position and Staff Run 128. Of the total, \$132,333 relate to GSR charges,
5 \$723,073 due to gas pricing, and approximately \$2.4 million due to assumptions on the
6 pricing and availability on spot market energy that is not under contract.

7 Based on the evidence presented in this testimony, the Commission should adopt
8 Empire's updated position of \$111,305,671 as the total cost for F&PP (on and off system)
9 because the Staff's results are neither representative or accurate.

10 Q. ARE THERE ANY ALTERNATIVES THE COMMISSION COULD CONSIDER IN
11 THIS CASE INSTEAD OF TAKING A POSITION ON THE COMPLICATED ISSUES
12 OUTLINED IN THIS TESTIMONY?

13 A. Yes. As outlined in my direct testimony, the Commission could choose to utilize an Interim
14 Energy Charge ("IEC"). In Empire's last Missouri rate case (Case No. ER-2001-299), a rider
15 termed the IEC was incorporated in Empire's rates to specifically address the volatility and
16 unpredictability of purchased power and natural gas prices. The IEC was large enough that it
17 tended to mask the differences in modeling results between Staff and Empire that are
18 described in this testimony.

19 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

20 A. Yes, at this time.

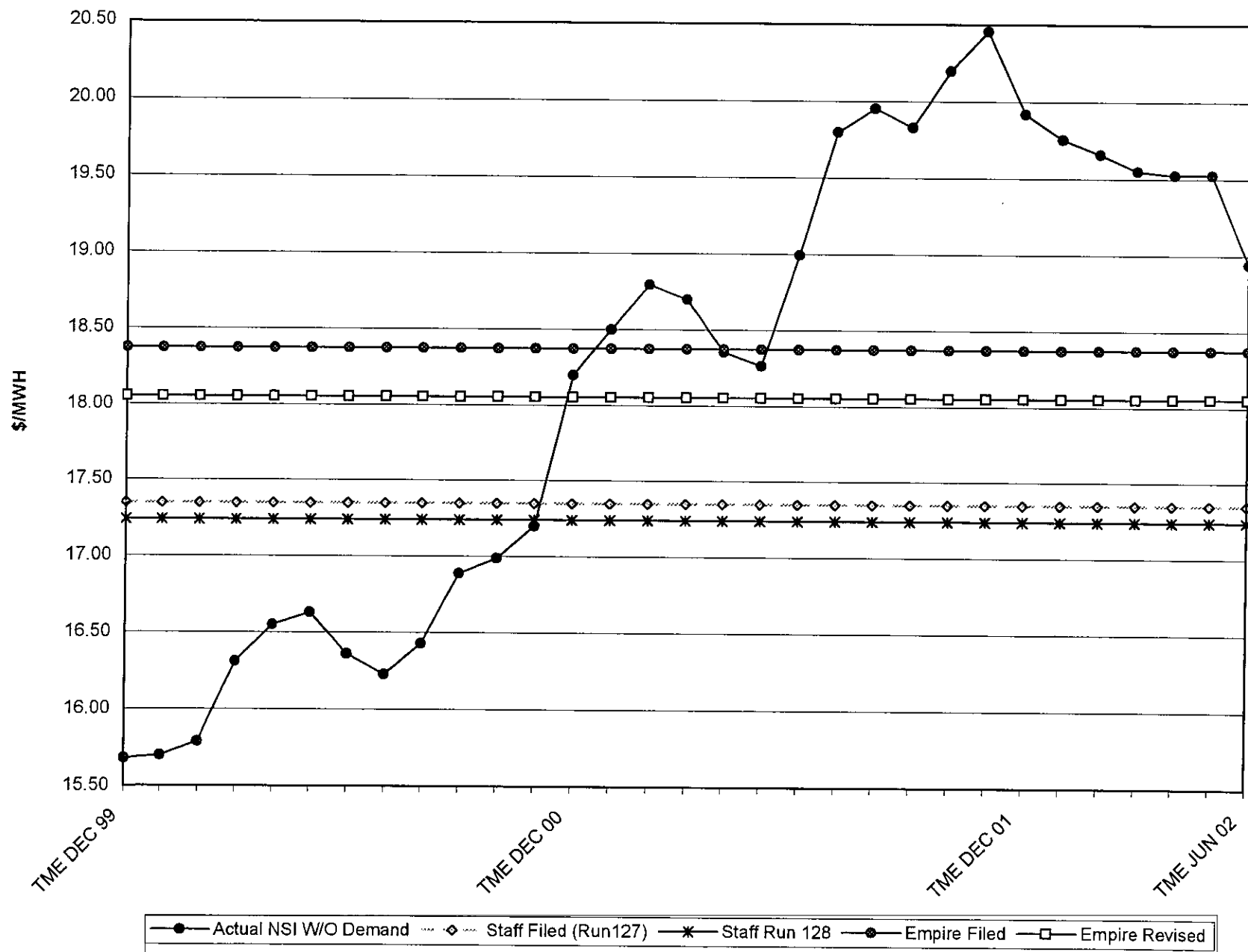
Schedule BPB-1

Empire District Electric Company
Case No. ER-2002-424
Summary of Annualized Fuel & Purchased Power Expense

Revised 9/19/02

Description	Source of Annualized Value	Staff Filed Run 127	Staff Run 128	Empire Filed	Empire Adjusted
<u>ON SYSTEM MODEL OUTPUTS</u>					
Annualized fuel	Fuel Run	\$53,808,652	\$54,571,006	\$63,697,784	\$63,472,000
Purchased power	Fuel Run	\$26,119,012	\$24,545,074	\$20,782,000	\$19,054,000
Western Adjustment	Discrepancy in TME Price		\$276,662		
Total On System Model Outputs		\$79,927,664	\$79,392,742	\$84,479,784	\$82,526,000
<u>FUEL TRANSPORTATION COSTS</u>					
Gas Transportation-fixed	Current Contract Price	\$3,285,044	\$3,285,044	\$3,285,044	\$3,285,044
Gas Transportation-commodity related (variable)	Current Contract Price	\$133,209			\$327,023
Losses @ 2.37 percent	Gas Tariff		\$864,326	\$821,416	\$909,427
Gas Supply Realignment (GSR)	12-mo Ended 6/30/02		\$135,202		\$267,333
Total fuel transportation		\$3,418,253	\$4,284,572	\$4,106,460	\$4,788,827
<u>NON-DISTRIBUTED AND OTHER FUEL RELATED COSTS</u>					
Fuel Handling - Nonlabor	Test Year - DR No. 255	\$193,558	\$193,559		\$193,559
Asbury Unit Train Maint. Costs	Test Year - DR No. 55	\$88,475	\$88,475		\$88,475
Rail Spur Costs	Test Year - DR No. 255	\$77,549	\$77,549		\$77,549
Iatan Unit Train Maint. Costs	Test Year - DR No. 55	\$10,617	\$10,617		\$10,617
Lease Iatan Unit Train	Test Year - DR No. 255	\$115,216	\$115,216		\$115,216
Property Taxes - Unit Trains	Test Year - DR No. 255	\$67,628	\$67,628		\$67,628
Lease Steel Train to Union Pacific	Test Year - DR No. 255	(\$675,000)	(\$675,000)		(\$675,000)
Lease Alum Unit Train	Test Year - DR No. 255	\$598,125	\$598,125		\$598,125
Lease Train for Genwal Coal	Test Year - DR No. 255	\$55,780	\$55,780		\$55,780
ARCO advance pymnt amortization	Test Year - DR No. 255	\$567,151	\$567,151		\$567,151
Maintenance of Railroad	Test Year - DR No. 255		\$79,263		\$79,263
Other-Nonlabor	Test Year - DR No. 255		\$96,684		\$96,684
Total non-distributed and other fuel related costs		\$1,099,099	\$1,275,047	\$1,484,000	\$1,275,047
<u>PURCHASE POWER DEMAND CHARGES</u>					
Western Resources	Current contract	\$16,193,520	\$16,193,520	\$16,193,520	\$16,193,520
WR Off-line auxiliary	12-mo Ended 6/30/02	\$57,549	\$57,549		
Total demand charges		\$16,251,069	\$16,251,069	\$16,193,520	\$16,193,520
OFFSET in MWH (4,902,060 vs 4,867,833)					\$520,472
<u>TOTAL ON SYSTEM FUEL AND PURCHASE POWER (NSI)</u>		\$100,696,085	\$101,203,430	\$106,263,764	\$104,262,922
<u>OFF SYSTEM SALES</u>					
Cost of off system sales (Fuel)	12-mo Ended 6/30/02	\$1,700,820	\$1,700,820	\$317,999	\$1,700,820
Cost of off system sales (Purchased Power Energy)	12-mo Ended 6/30/02	\$3,630,018	\$3,630,018	\$847,170	\$3,630,018
Off-system sales (Demand Charges)	12-mo Ended 6/30/02	\$1,711,911	\$1,711,911	\$1,712,128	\$1,711,911
Energy exchanged - SWPA	Test Year	\$1,598	\$1,598		
<u>TOTAL OFF SYSTEM FUEL AND PURCHASE POWER</u>		\$7,044,347	\$7,044,347	\$2,877,297	\$7,042,749
<u>TOTAL FUEL AND PURCHASE POWER (NSO)</u>		\$107,740,432	\$108,247,777	\$109,141,061	\$111,305,671
NSI \$ w/out purchase power demand		\$84,445,016	\$84,952,361	\$90,070,244	\$88,069,402
NSI \$/MWH w/out purchase power demand		17.35	17.45	18.37	18.09

TME FUEL & PURCHASED POWER ENERGY COSTS FOR NSI



Empire District Electric Gas Position Summary as of July 1, 2002									
	July 2002	August 2002	September 2002	Oct-Dec 2002	Jul-Dec 2002	Year 2003	Year 2004	Year 2005	Net All Years
Budget DTh	1,731,602	1,823,149	898,302	2,138,036	6,591,089	13,715,667	14,352,389	15,371,038	50,030,181
Expected DTh	1,082,000	1,119,000	493,000	1,035,000	3,729,000	13,715,667	14,352,389	15,371,038	47,168,092
Policy minimum hedged DTh (2)	865,600	895,200	394,400	828,000	2,983,200	8,229,400	5,740,956	3,074,207	20,027,763
Policy maximum hedged DTh	1,082,000	1,119,000	493,000	1,035,000	3,729,000	10,972,534	8,611,433	6,148,414	29,461,381
Amount Hedged from Upside Volatility Dth	2,212,000	1,126,000	490,000	1,030,005	3,732,005	9,300,000	6,600,000	1,800,000	21,432,005
percentage	204%	101%	99%	100%	100%	68%	46%	12%	45%
Amount Hedged from Downside Volatility Dth	2,212,000	1,126,000	490,000	1,030,005	3,732,005	9,300,000	6,600,000	1,800,000	21,432,005
percentage	204%	101%	99%	100%	100%	68%	46%	12%	45%
Bookout per physical Dth, all positions	2.534	2.541	2.681	3.042	2.729	2.114	-2.182	3.763	2.555
Average Cost per Dth hedged	2.431	2.463	2.427	2.721	2.511	3.370	3.291	3.763	3.094
Net All Positions Marked to Market \$ (1)	1,311,350	650,930	302,370	816,452	2,430,172	3,804,060	3,611,900	186,000	10,032,132
PHYSICAL HEDGES									
Purchased DTh (3)	2,392,000	1,196,000	700,000	1,600,005	4,692,005	2,400,000	600,000	1,800,000	9,492,005
Purchased \$	6,785,360	3,407,600	1,994,000	5,091,017	13,870,377	8,167,000	2,256,000	6,774,000	31,067,377
Purchased \$/Dth	2.837	2.849	2.849	3.182	2.956	3.403	3.760	3.763	3.273
Market \$	7,373,340	3,689,660	2,179,100	5,684,219	15,236,659	8,877,600	2,302,900	6,960,000	33,377,159
Market \$/Dth (on Williams Pipeline)	3.083	3.085	3.113	3.553	3.247	3.699	3.838	3.867	3.516
Gain/(Loss) versus current market	587,980	282,060	185,100	593,202	1,366,282	710,600	46,900	186,000	2,309,782
FINANCIAL HEDGES									
Swap/Futures Dth Purchased	0	0	0	0	0	4,500,000	6,000,000	0	10,500,000
Net Cost, \$/Dth	0.000	0.000	0.000	0.000	0.000	3.096	3.244	0.000	
Market \$/Dth (at Henry Hub or Swap location)	0.000	0.000	0.000	0.000	0.000	3.665	3.838	0.000	
Swap Settlement - Receipt / (Payment)	-	-	-	-	-	2,559,000	3,565,000	-	6,124,000
Swap/Futures Dth Sold or Settle	980,000	470,000	210,000	570,000	1,760,000	0	0	0	1,760,000
Net Cost, \$/Dth	3.816	3.835	3.831	4.015	3.882	0.000	0.000	0.000	
Market \$/Dth (at Henry Hub or Swap location)	3.241	3.245	3.273	3.623	3.368	0.000	0.000	0.000	
Swap Settlement - Receipt / (Payment)	563,970	277,470	117,270	223,250	904,490	-	-	-	904,490
Call Dth (Buy a Call)	0	0	0	0	0	0	0	0	0
Call Strike \$/Dth	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
Market \$/Dth (at Henry Hub or Swap location)	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
Cost of Call \$/Dth	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
Value \$ of Call Position	-	-	-	-	-	-	-	-	0
(Cost) \$ of Call Position	-	-	-	-	-	-	-	-	0
Collar Dth	800,000	400,000	-	-	800,000	2,400,000	-	-	3,200,000
Floor \$/Dth	2.615	2.620	0.000	0.000	2.615	3.350	0.000	0.000	
Ceiling \$/Dth	2.915	2.920	0.000	0.000	2.915	4.000	0.000	0.000	
Market \$/Dth (at Henry Hub or Swap location)	3.083	3.085	0.000	0.000	3.083	3.876	0.000	0.000	
Cost of Floor \$/Dth	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
Value of Ceiling \$/Dth	0.199	0.229	0.000	0.000	0.199	0.223	0.000	0.000	
(Cost) / Value \$ of Collar Position	159,400	91,400	-	-	159,400	534,460	-	-	693,860
Put Dth (Sell a Put)	0	0	0	0	0	0	0	0	0
Put Strike \$/Dth	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
Market \$/Dth (at Henry Hub or Swap location)	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
Revenue from Put \$/Dth	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
Value \$ of Put Position	-	-	-	-	-	-	-	-	0
(Cost) \$ of Put Position	-	-	-	-	-	-	-	-	0

Note 1: Market data using NYMEX Close Prices as of June 28, 2002.

Note 2: Policy minimums and maximums are 12/31/2002 targets

Note 3: Total contracts with Enron for the years 2002 and 2003 are cancelled and are therefore not included.

Build ID: 001582

Empire District Electric Company

p. 1

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2003: 12 Months thru Dec. EDE, Planning Year 2002 Scenarios, F&PP Budget

3 iter Convergent Monte

No. Station	Energy GWh	Use Factr %	Strts	Fuel Burn GBtu	Heat Rate Btu/kWh	Hours per Unit	Fuel-or-Prch c/MMBtu <F> \$/MWh <P>	Cost \$1000	Start Cost \$1000	O&M Fixed \$1000	O&M Varbl \$1000	Opertg Cost \$/MWh	Total Cost \$/MWh	Total Cost \$1000
1 Asbury 1	1309.7	94.1	11	14670.2	11201	7547	104.9	15391	28	0	786	12.35	12.37	16204
2 Asbury 2	1.0	1.0	29	18.1	18252	153	105.4	19	0	0	15	34.23	34.23	34
3 Riverton 7	150.1	80.0	12	1947.3	12971	7057	117.4	2286	12	0	150	16.23	16.30	2448
4 Riverton 8	276.8	80.8	4	3330.6	12034	7879	114.6	3818	4	0	277	14.79	14.81	4099
5 Riverton 9and10	27.5	12.0	21	501.3	18244	1243	343.0	1719	63	0	82	65.57	67.85	1864
6 Riverton 11	4.2	3.4	30	78.7	18709	491	344.5	271	46	0	13	67.45	78.27	329
7 Energy Center 1	44.8	7.5	66	782.6	17467	1245	343.0	2684	199	0	168	63.67	68.11	3051
8 Energy Center 2	30.6	5.1	52	532.4	17420	839	344.1	1832	156	0	115	63.69	68.79	2103
9 Energy Center 3	0.0	0.0	0	0.0	0	0	0.0	0	0	0	0	0.00	0.00	0
10 Energy Center 4	0.0	0.0	0	0.0	0	0	0.0	0	0	0	0	0.00	0.00	0
11 State Line 1	105.8	16.4	25	1272.9	12036	1243	344.0	4378	126	0	317	44.40	45.59	4821
12 SLCC 1x1	319.0	28.4	60	2413.6	7566	2793	341.5	8243	1678	0	1116	29.34	34.60	11037
13 SLCC 2x1	759.5	40.7	17	5578.5	7345	3768	344.4	19211	828	0	2278	28.29	29.38	22317
14 Iatan 1	573.5	96.3	13	5766.1	10055	7389	62.7	3618	31	0	344	6.91	6.96	3993
15 Ozark Beach	65.9	47.0	0			8760	0.00	0	0	0	0	0.00	0.00	0
16 AEP Purch	0.0	0.0	0	0.0	0	8760	0.0	0	0	0	0	0.00	0.00	0
17 KGE Purch	0.0	0.0	0	0.0	0	8760	0.0	0	0	0	0	0.00	0.00	0
18 WRI Purch 1	339.7	85.3	6			7346	12.49	4243	0	5398	0	12.49	28.38	9641
19 WRI Purch 2	313.5	78.7	6			7358	12.49	3915	0	5398	0	12.49	29.71	9313
20 WRI Purch 3	288.3	72.4	9			7226	12.49	3601	0	5398	0	12.49	31.21	8999
21 Off Peak 0	104.1	10.2	312			5685	19.64	2045	0	0	0	19.64	19.64	2045
22 On Peak 1	174.1	36.7	304			7119	28.24	4916	0	0	0	28.24	28.24	4916
23 unserved energy	0.0	0.0	0	0.0	0	8424	0.0	0	0	0	0	0.00	0.00	0
24 emergency purch	8.7	0.2	18			85	38.35	334	0	0	0	38.35	38.35	334
25 GasFT Storage	0.0	0.0	0	0.0	0	8760	0.0	0	0	0	0	0.00	0.00	0
26 train costs	0.0	0.0	0	0.0	0	8760	0.0	0	0	0	0	0.00	0.00	0
SYSTEM PRODUCTION	4896.7		997	36892.2	10241			82526	3169	16194	5662	18.01	21.96	107550

No. Group	Energy GWh	Use Factr %	Strts	Fuel Burn GBtu	Heat Rate Btu/kWh	Hours per Unit	Fuel-or-Prch c/MMBtu <F> \$/MWh <P>	Cost \$1000	Start Cost \$1000	O&M Fixed \$1000	O&M Varbl \$1000	Opertg Cost \$/MWh	Total Cost \$/MWh	Total Cost \$1000
Native Load	4885.3													
Dump Power	11.4												12.61	143
Tran. Losses	0.0													
LESS Resources (Exports):														
1 EDE Fuel	3602.3	46.1	340	36892.2	10241		172.0	63471	3169	0	5662	19.19	20.07	72302
2 Hydro	65.9	47.0	0				0.00	0	0	0	0	0.00	0.00	0
3 contract Purch	941.5	78.8	22				12.49	11760	0	16194	0	12.49	29.69	27953
4 non contract	286.9	5.3	634				25.43	7295	0	0	0	25.43	25.43	7295
5 all	0.0	0.0	0				0.00	0	0	0	0	0.00	0.00	0
Resource Totals	4896.7		997	36892.2	10241			82526	3169	16194	5662	18.01	21.96	107550
E.N.S.	0.0												94.56	0
SYSTEM													21.93	107407

Fuel Use Report

No. Fuel	GBtu used	Commod \$000	Volumel \$000	Volume2 \$000	Demand \$000	Total \$000	c/GBtu average	Units used
----------	--------------	-----------------	------------------	------------------	-----------------	----------------	-------------------	---------------

Fuels Section

asb.wstl.coal
 FuelPrice [2003m1] 99.3 [2003m9] 95.4
 HeatValueF 17.6 ! MMBtu/ton

riv.wst.coal
 FuelPrice [2003m1] 115.8 [2003m9] 111.8
 HeatValueF 17.6 ! MMBtu/ton

iat.wst.coal
 FuelPrice [2003] 61.5
 HeatValueF 17.6 ! MMBtu/ton

asb.local.coal
 FuelPrice [2003m1] 164.5
 HeatValueF 25.2 ! MMBtu/ton

riv.local.coal
 FuelPrice [2003m1] 122.0
 HeatValueF 25.4 ! MMBtu/ton

!***** GAS PRICES *****

Nat.Gas.Riv
 Fuelgroup Nat.Gas
 FuelPrice [2003m1] 346.1 [2003m2] 342.6 [2003m3] 345.8 [2003m4] 335.0 -
 [2003m5] 333.8 [2003m6] 344.4 [2003m7] 347.5 [2003m8] 351.0 -
 [2003m9] 341.3 [2003m10] 332.1 [2003m11] 336.0 [2003m12] 348.5
 HeatValueF 1.0

Nat.gas.EC
 Fuelgroup Nat.Gas
 FuelPrice [2003m1] 346.1 [2003m2] 342.6 [2003m3] 345.8 [2003m4] 335.0 -
 [2003m5] 333.8 [2003m6] 344.4 [2003m7] 347.5 [2003m8] 351.0 -
 [2003m9] 341.3 [2003m10] 332.1 [2003m11] 336.0 [2003m12] 348.5
 HeatValueF 1.0

Nat.gas.CC
 Fuelgroup Nat.Gas
 FuelPrice [2003m1] 346.1 [2003m2] 342.6 [2003m3] 345.8 [2003m4] 335.0 -
 [2003m5] 333.8 [2003m6] 344.4 [2003m7] 347.5 [2003m8] 351.0 -
 [2003m9] 341.3 [2003m10] 332.1 [2003m11] 336.0 [2003m12] 348.5
 HeatValueF 1.0

Nat.Gas.SL1
 Fuelgroup Nat.Gas
 FuelPrice [2003m1] 346.1 [2003m2] 342.6 [2003m3] 345.8 [2003m4] 335.0 -
 [2003m5] 333.8 [2003m6] 344.4 [2003m7] 347.5 [2003m8] 351.0 -
 [2003m9] 341.3 [2003m10] 332.1 [2003m11] 336.0 [2003m12] 348.5
 HeatValueF 1.0

!***** #2 oil PRICES *****

oil
 FuelPrice [2003] 537.55 !TME JUNE 02
 heatvaluef 138.7 ! mmbtu/gal

Stations Section

GasFT.Storage

Area	Empire
Plant	ft.demand
StationGroup	all
StationType	=thermal
TransArea(separate.areas)	ede
Price	[2000] 0.00
CapacityMax	0
CapacityMin	0
Spinstatus	=nonfirm
fixedcostm	[2003] 0

train.costs

Area	Empire
Plant	train.costs
StationGroup	all
StationType	=thermal
TransArea(separate.areas)	ede
Price	[2000] 0.00
CapacityMax	0
CapacityMin	0
Spinstatus	=nonfirm
fixedcostm	[2003] 0

Iatan.1

fixedcostm	[2003m1] 0
------------	------------

Stations Section

WRI.Purch.1

Area	Empire
Plant	Wri.Purch
StationGroup	contract.Purch
StationType	=thermal
TransArea(separate.areas)	ede
Price	[2003m1] 12.49
CapacityMax	[2001m1] 54 [2010m6] 0
CapacityMin	[2001m1] 16 [2010m6] 0
Spinstatus	=firm
Maintdays	[2003m4d3] 33
OUTAGE	.075
mindown	8
minup	8
fixedcostm	[2001m1] 449820

WRI.Purch.2

Area	Empire
Plant	Wri.Purch
StationGroup	contract.Purch
StationType	=thermal
TransArea(separate.areas)	ede
Price	[2003m1] 12.49
CapacityMax	[2001m1] 54 [2010m6] 0
CapacityMin	[2001m1] 16 [2010m6] 0
Spinstatus	=firm
Maintdays	[2003m4d1] 33
OUTAGE	.075
mindown	8
minup	8
fixedcostm	[2001m1] 449820

WRI.Purch.3

Area	Empire
Plant	Wri.Purch
StationGroup	contract.Purch
StationType	=thermal
TransArea(separate.areas)	ede
Price	[2003m1] 12.49
CapacityMax	[2001m1] 54 [2010m6] 0
CapacityMin	[2001m1] 16 [2010m6] 0
Spinstatus	=firm
Maintdays	[2003m1d26] 33
OUTAGE	.075
mindown	8
minup	8
fixedcostm	[2001m1] 449820

Non Contract Spot Purchases

Off.Peak.Spot

Area	Empire
Plant	OffPeak
StationGroup	non.contract
StationType	=thermal
TransArea(separate.areas)	ede

Price	[wp]	[2003]	[m1]	[wkd]	18.64	[6am]	0	[10pm]	18.64	-
			[wke]		18.64					-
			[m2]	[wkd]	17.37	[6am]	0	[10pm]	17.37	-
			[wke]		17.37					-
			[m3]	[wkd]	22.11	[6am]	0	[10pm]	22.11	-
			[wke]		22.11					-
			[m4]	[wkd]	26.00	[6am]	0	[10pm]	26.00	-
			[wke]		26.00					-
			[m5]	[wkd]	15.91	[6am]	0	[10pm]	15.91	-
			[wke]		15.91					-

```

[m6] [wkd] 17.11 [6am] 0 [10pm] 17.11 -
[wke] 17.11 -
[m7] [wkd] 32.98 [6am] 0 [10pm] 32.98 -
[wke] 32.98 -
[m8] [wkd] 34.36 [6am] 0 [10pm] 34.36 -
[wke] 34.36 -
[m9] [wkd] 17.63 [6am] 0 [10pm] 17.63 -
[wke] 17.63 -
[m10] [wkd] 18.63 [6am] 0 [10pm] 18.63 -
[wke] 18.63 -
[m11] [wkd] 17.09 [6am] 0 [10pm] 17.09 -
[wke] 17.09 -
[m12] [wkd] 17.12 [6am] 0 [10pm] 17.12 -
[wke] 17.12

```

CapacityMax [wp]

```

[m1] [wkd] 250 [6am] 0 [10pm] 250 -
[wke] 200 -
[m2] [wkd] 250 [6am] 0 [10pm] 250 -
[wke] 200 -
[m3] [wkd] 250 [6am] 0 [10pm] 250 -
[wke] 200 -
[m4] [wkd] 250 [6am] 0 [10pm] 250 -
[wke] 200 -
[m5] [wkd] 250 [6am] 0 [10pm] 250 -
[wke] 200 -
[m6] [wkd] 250 [6am] 0 [10pm] 250 -
[wke] 200 -
[m7] [wkd] 250 [6am] 0 [10pm] 250 -
[wke] 200 -
[m8] [wkd] 250 [6am] 0 [10pm] 250 -
[wke] 200 -
[m9] [wkd] 250 [6am] 0 [10pm] 250 -
[wke] 200 -
[m10] [wkd] 250 [6am] 0 [10pm] 250 -
[wke] 200 -
[m11] [wkd] 250 [6am] 0 [10pm] 250 -
[wke] 200 -
[m12] [wkd] 250 [6am] 0 [10pm] 250 -
[wke] 200

```

CapacityMin [wp]

```

[m1] [wkd] 10 [6am] 0 [10pm] 10 -
[wke] 10 -
[m2] [wkd] 10 [6am] 0 [10pm] 10 -
[wke] 10 -
[m3] [wkd] 10 [6am] 0 [10pm] 10 -
[wke] 10 -
[m4] [wkd] 10 [6am] 0 [10pm] 10 -
[wke] 10 -
[m5] [wkd] 10 [6am] 0 [10pm] 10 -
[wke] 10 -
[m6] [wkd] 10 [6am] 0 [10pm] 10 -
[wke] 10 -
[m7] [wkd] 10 [6am] 0 [10pm] 10 -
[wke] 10 -
[m8] [wkd] 10 [6am] 0 [10pm] 10 -
[wke] 10 -
[m9] [wkd] 10 [6am] 0 [10pm] 10 -
[wke] 10 -
[m10] [wkd] 10 [6am] 0 [10pm] 10 -
[wke] 10 -
[m11] [wkd] 10 [6am] 0 [10pm] 10 -
[wke] 10 -
[m12] [wkd] 10 [6am] 0 [10pm] 10 -
[wke] 10

```

```

Spinstatus      [2003m1] =firm [2003m6] =nonfirm [2003m9d15] =firm
commit          =economic
dispatch        =economic
srunusedmw      0

```

mindown 1
minup 1

On.Peak.Spot
Area Empire
Plant OnPeak
StationGroup non.contract
StationType =thermal
TransArea(separate.areas) ede

Price [wp] [2003] [m1] [wkd] 0 [6am] 24.15 [10pm] 0 -
[wke] 0 -
[m2] [wkd] 0 [6am] 20.75 [10pm] 0 -
[wke] 0 -
[m3] [wkd] 0 [6am] 29.49 [10pm] 0 -
[wke] 0 -
[m4] [wkd] 0 [6am] 33.80 [10pm] 0 -
[wke] 0 -
[m5] [wkd] 0 [6am] 29.58 [10pm] 0 -
[wke] 0 -
[m6] [wkd] 0 [6am] 28.72 [10pm] 0 -
[wke] 0 -
[m7] [wkd] 0 [6am] 42.86 [10pm] 0 -
[wke] 0 -
[m8] [wkd] 0 [6am] 40.38 [10pm] 0 -
[wke] 0 -
[m9] [wkd] 0 [6am] 24.66 [10pm] 0 -
[wke] 0 -
[m10] [wkd] 0 [6am] 27.15 [10pm] 0 -
[wke] 0 -
[m11] [wkd] 0 [6am] 25.86 [10pm] 0 -
[wke] 0 -
[m12] [wkd] 0 [6am] 24.58 [10pm] 0 -
[wke] 0

CapacityMax [wp] [m1] [wkd] 0 [6am] 73 [10pm] 0 -
[wke] 0 -
[m2] [wkd] 0 [6am] 115 [10pm] 0 -
[wke] 0 -
[m3] [wkd] 0 [6am] 98 [10pm] 0 -
[wke] 0 -
[m4] [wkd] 0 [6am] 69 [10pm] 0 -
[wke] 0 -
[m5] [wkd] 0 [6am] 53 [10pm] 0 -
[wke] 0 -
[m6] [wkd] 0 [6am] 133 [10pm] 0 -
[wke] 0 -
[m7] [wkd] 0 [6am] 128 [10pm] 0 -
[wke] 0 -
[m8] [wkd] 0 [6am] 80 [10pm] 0 -
[wke] 0 -
[m9] [wkd] 0 [6am] 145 [10pm] 0 -
[wke] 0 -
[m10] [wkd] 0 [6am] 160 [10pm] 0 -
[wke] 0 -
[m11] [wkd] 0 [6am] 194 [10pm] 0 -
[wke] 0 -
[m12] [wkd] 0 [6am] 120 [10pm] 0 -
[wke] 0

CapacityMin [wp] [m1] [wkd] 0 [6am] 10 [10pm] 0 -
[wke] 0 -
[m2] [wkd] 0 [6am] 10 [10pm] 0 -
[wke] 0 -
[m3] [wkd] 0 [6am] 10 [10pm] 0 -
[wke] 0 -
[m4] [wkd] 0 [6am] 10 [10pm] 0 -

```

[wke] 0 -
[m5] [wkd] 0 [6am] 10 [10pm] 0 -
[wke] 0 -
[m6] [wkd] 0 [6am] 10 [10pm] 0 -
[wke] 0 -
[m7] [wkd] 0 [6am] 10 [10pm] 0 -
[wke] 0 -
[m8] [wkd] 0 [6am] 10 [10pm] 0 -
[wke] 0 -
[m9] [wkd] 0 [6am] 10 [10pm] 0 -
[wke] 0 -
[m10] [wkd] 0 [6am] 10 [10pm] 0 -
[wke] 0 -
[m11] [wkd] 0 [6am] 10 [10pm] 0 -
[wke] 0 -
[m12] [wkd] 0 [6am] 10 [10pm] 0 -
[wke] 0

```

MinUp 1

Spinstatus [2003m1] =firm [2003m6] =nonfirm [2003m9d15] =firm
 commit 3

Emergency.purch.Spot

```

Area      Empire
Plant     outage.purch
StationGroup non.contract
StationType =thermal
TransArea(separate.areas) ede
Price [wp] [2003] [m1] [wkd] 0 [6am] 29.47 [10pm] 0 -
[wke] 0 -
[m2] [wkd] 0 [6am] 35.09 [10pm] 0 -
[wke] 0 -
[m3] [wkd] 0 [6am] 32.11 [10pm] 0 -
[wke] 0 -
[m4] [wkd] 0 [6am] 30.59 [10pm] 0 -
[wke] 0 -
[m5] [wkd] 0 [6am] 28.46 [10pm] 0 -
[wke] 0 -
[m6] [wkd] 0 [6am] 41.15 [10pm] 0 -
[wke] 0 -
[m7] [wkd] 0 [6am] 67.52 [10pm] 0 -
[wke] 0 -
[m8] [wkd] 0 [6am] 78.17 [10pm] 0 -
[wke] 0 -
[m9] [wkd] 0 [6am] 28.16 [10pm] 0 -
[wke] 0 -
[m10] [wkd] 0 [6am] 28.41 [10pm] 0 -
[wke] 0 -
[m11] [wkd] 0 [6am] 31.78 [10pm] 0 -
[wke] 0 -
[m12] [wkd] 0 [6am] 29.83 [10pm] 0 -
[wke] 0

```

CapacityMax [2002] 450
 CapacityMin 0
 commit 5
 Spinstatus =nonfirm

***** THERMAL STATIONS *****

Asbury.1 (1+)

Stationtype =thermal
 Area Empire
 Plant Asbury
 StationGroup EDE.Fuel
 TransArea(separate.areas) EDE
 Fuel [v2] asb.wst.coal asb.local.coal
 fuelratio [v2] .90 .10
 Peakcapacity [2002] 193
 CapacityMax [2002] 183
 CapacityMin 105
 Outage [2002] .065
 Heatpoints [v5] 110 140 162 188 191
 Heatrate [v5] 11485 11230 11135 11180 11210
 Maintdays [2003m4d27] 26
 Startfuel 1200
 startfuelname oil
 MinDown 90
 RampRate 90
 startcost 2500
 spinstatus =firm
 srunusedmw 60
 meantimerep 60
 commit =economic
 dispatch =economic
 convgroup 1
 CommitVOM 0.60
 DispatchVOM 0.60
 VOMcost 0.60
 fixedcostm 0

Asbury.2

Stationtype =thermal
 Area Empire
 Plant Asbury
 StationGroup ede.fuel
 TransArea(separate.areas) EDE
 Fuel [v2] asb.wst.coal asb.local.coal
 fuelratio [v2] .90 .10
 Peakcapacity 20
 CapacityMax 16
 CapacityMin 4
 Outage [2002] .20
 Heatpoints [v2] 4 20
 Heatrate [v2] 18300 18200
 Maintdays [2003m4d27] 26
 Startfuel 0
 startfuelname oil
 MinDown 60
 RampRate 60
 startcost 0000
 spinstatus =firm
 srunusedmw 10
 meantimerep 60
 commit =economic
 dispatch =economic
 convgroup 1
 CommitVOM 15.0
 DispatchVOM 15.0
 VOMcost 15.0
 fixedcostm 0

Riverton.7

Stationtype =thermal
 Area Empire
 Plant Riverton
 StationGroup ede.fuel
 TransArea(separate.areas) EDE
 Fuel [v2] riv.wst.coal riv.local.coal

fuelratio	[v2] .75 .25
Peakcapacity	38
CapacityMax	23
CapacityMin	19
Outage	.015
Heatpoints	[v3] 19 25 38
Heatrate	[v3] 12950 12700 22800
Maintdays	[2003m11d15] 20
Startfuel	600
startfuelname	nat.gas.Riv
MinDown	12
RampRate	40
startcost	1000
spinstatus	=firm
srusedmw	10
meantimerep	48
commit	=economic
dispatch	=economic
convgroup	1
CommitVOM	1.00
DispatchVOM	1.00
VOMcost	1.00
fixedcostm	0

Riverton.8

Stationtype	=thermal
Area	Empire
Plant	Riverton
StationGroup	ede.fuel
TransArea(separate.areas)	EDE
Fuel	[v2] riv.wst.coal riv.local.coal
fuelratio	[v2] 1.00 .0
Peakcapacity	54
CapacityMax	42
dispatchpeak	7
CapacityMin	26
Outage	.015
Heatpoints	[v3] 30 46 54
Heatrate	[v3] 12080 11980 21610
Maintdays	[2003m3d6] 20
Startfuel	600
startfuelname	nat.gas.Riv
MinDown	12
RampRate	40
startcost	1000
spinstatus	=firm
srusedmw	20
meantimerep	72
commit	=economic
dispatch	=economic
convgroup	1
CommitVOM	1.00
DispatchVOM	1.00
VOMcost	1.00
fixedcostm	0

Riverton.9and10

Stationtype	=thermal
Area	Empire
Plant	Riverton
StationGroup	ede.fuel
TransArea(separate.areas)	EDE
Fuel	[v1] nat.gas.Riv
dispatchfcm	0.6
commitfcm	0.6
Peakcapacity	[2001m1] 28
CapacityMax	[2001m1] 28
CapacityMin	[2001m1] 20
Outage	.05
Heatpoints	[v2] 20 28
Heatrate	[v2] 18500 17500

Maintdays	[2002m9d30] 27
Startfuel	100
startfuelname	nat.gas.Riv
minup	12
MinDown	24
RampRate	60
startcost	3000
spinstatus	=firm
meantimerep	72
commit	=economic
dispatch	=economic
convgroup	1
CommitVOM	3.00
DispatchVOM	3.00
VOMcost	3.00
fixedcostm	0

Riverton.11

Stationtype	=thermal
Area	Empire
Plant	Riverton
StationGroup	ede.fuel
TransArea(separate.areas)	EDE
Fuel	[v1] nat.gas.Riv
Peakcapacity	16
CapacityMax	16
CapacityMin	8
Outage	.05
Heatpoints	[v2] 10 16
Heatrate	[v2] 18534 17034
Maintdays	[2003m10d27] 27
Startfuel	50
startfuelname	nat.gas.Riv
minup	12
MinDown	24
RampRate	60
startcost	1500
spinstatus	=firm
meantimerep	60
commit	=economic
dispatch	=economic
convgroup	1
CommitVOM	3.00
DispatchVOM	3.00
VOMcost	3.00
fixedcostm	0

Energy.Center.1

Stationtype	=thermal
Area	Empire
Plant	Energy.Center
StationGroup	ede.fuel
TransArea(separate.areas)	EDE
Fuel	[v1] nat.gas.EC
Peakcapacity	85
CapacityMax	80
CapacityMin	30
Outage	.075
Heatpoints	[v5] 30 50 70 85 90
Heatrate	[v5] 18850 14700 13550 13100 12990
Maintdays	[2003m3d1] 27
Startfuel	150
startfuelname	nat.gas.EC
MinDown	24
Minup	12
RampRate	60
startcost	3000
spinstatus	=firm
srunusedmw	50
meantimerep	72

commit	=economic
*dispatch	=economic
convgroup	1
CommitVOM	3.75
DispatchVOM	3.75
VOMcost	3.75
fixedcostm	0

Energy.Center.2

Stationtype	=thermal
Area	Empire
Plant	Energy.Center
StationGroup	ede.fuel
TransArea(separate.areas)	EDE
Fuel	[v1] nat.gas.EC
Peakcapacity	85
CapacityMax	80
CapacityMin	30
Outage	.075
Heatpoints	[v5] 30 50 70 85 90
Heatrate	[v5] 18850 14700 13550 13100 12990
Maintdays	[2003m5d10] 27
Startfuel	150
startfuelname	nat.gas.EC
MinDown	24
Minup	12
RampRate	60
startcost	3000
spinstatus	=firm
srunusedmw	50
meantimerep	72
commit	=economic
dispatch	=economic
convgroup	1
CommitVOM	3.75
DispatchVOM	3.75
VOMcost	3.75
fixedcostm	0

State.Line.1

Stationtype	=thermal
Area	Empire
Plant	State.Line
StationGroup	ede.fuel
TransArea(separate.areas)	EDE
Fuel	[v1] nat.gas.SL1
Peakcapacity	90
CapacityMax	86
CapacityMin	85
Outage	.075
Heatpoints	[v2] 85 86
Heatrate	[v2] 12000 12000
Maintdays	[2003m9d30] 27
Startfuel	150
startfuelname	nat.gas.SL1
MinDown	24
Minup	24
RampRate	60
startcost	5000
spinstatus	=firm
srunusedmw	50
meantimerep	120
commit	=economic
dispatch	=economic
convgroup	1
CommitVOM	3.00
DispatchVOM	3.00
VOMcost	3.00
fixedcostm	0

SLCC.1x1

Stationtype	=thermal
Area	Empire
Plant	State.Line
StationGroup	ede.fuel
TransArea(separate.areas)	EDE
Fuel	Nat.Gas.CC
Peakcapacity	150
CapacityMax	150
CapacityMin	110
Outage	.07
Heatpoints	[v4] 110 120 135 150
Heatrate	[v4] 7600 7400 7150 6950
Maintdays	[2003m3d27] 30
Startfuel	300
startfuelname	Nat.Gas.CC
MinDown	36
Minup	48
RampRate	60
startcost	28000
spinstatus	=firm
srusedmw	60
meantimerep	72
commit	=economic
dispatch	=economic
convgroup	1
CommitVOM	3.50
DispatchVOM	3.50
VOMcost	3.50
fixedcostm	0

SLCC.2x1

Stationtype	=thermal
Area	Empire
Plant	State.Line
StationGroup	ede.fuel
TransArea(separate.areas)	EDE
Fuel	Nat.Gas.CC
Peakcapacity	300
CapacityMax	270
CapacityMin	180
Outage	.14
Heatpoints	[v6] 180 195 210 225 240 300
Heatrate	[v6] 7600 7400 7250 7000 6900 6850
Maintdays	[2003m3d27] 30
Startfuel	480
startfuelname	Nat.Gas.CC
MinDown	36
Minup	72
RampRate	60
startcost	48000
spinstatus	=firm
srusedmw	60
meantimerep	72
commit	=economic
dispatch	=economic
convgroup	1
CommitVOM	3.00
DispatchVOM	3.00
VOMcost	3.00
fixedcostm	0
Commitfcm	1.05

Iatan.1

Stationtype	=thermal
Area	Empire
Plant	Iatan
StationGroup	EDE.Fuel

```

TransArea(separate.areas) EDE
Fuel [v1] iat.wst.coal
Peakcapacity 80
CapacityMax 80
CapacityMin 40
Outage .075
Heatpoints [v2] 70 80
Heatrate [v2] 10100 10025
Maintdays [2003m10d5] 30
Startfuel 1200
startfuelname oil
MinDown 60
RampRate 90
startcost 2500
spinstatus =firm
srunusedmw 60
meantimerep 60
commit =economic
dispatch =economic
convgroup 1
CommitVOM 0.60
DispatchVOM 0.60
VOMcost 0.60

```

```

!*****
!
! HYDRO
!*****

```

Ozark.Beach

```

Area Empire
Plant Ozark.Beach
StationGroup Hydro
StationType =hydro
TransArea(separate.areas) ede
ConvGroup 1
Price [2001] 0
CapacityMax [2002] 16
CapacityMin 2
EnergyM [ap] 6.5 6.5 6.5 6.5 6.5 6.5 6 6 4.25 2.125 2.5 6

```

System Section

----- Simulation Control -----

MaintMethod =Scheduled

Iterations 3

DispatchIncr 1

HydroIncr 1

Inflation [2001] 0.025

CostEngyNS [2001] 90 [GRI] .0

DumpPrice [2001] 12.0 [GRI] 0.0

ConvergeTOD 1

SR [2003m1] 0 [2003m6] 35 [2003m9d15] 0

Rulegroups Section

asbury.2.rule

stations	asbury.2
commitonly	asbury.1

SLCC.1x1.rule

stations	SLCC.1x1
CommitUnless	SLCC.2x1

Riverton.9and10.rule

stations	Riverton.9and10
commitonly	[v2] Riverton.7 Riverton.8

WRI.Purch.rule

stations	[v3] WRI.Purch.1 WRI.Purch.2 WRI.Purch.3
CommitStas	1

System Section

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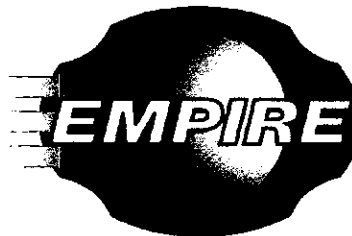
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PrintTime	0
PrintHours	1
PrintGraphs	=yes
PrintOutages	=yes
PrintHour	1

THE EMPIRE DISTRICT ELECTRIC COMPANY

ENERGY RISK MANAGEMENT POLICY

July 19, 2002



Services You Count On

THE EMPIRE DISTRICT ELECTRIC COMPANY ENERGY RISK MANAGEMENT POLICY

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1 STANDARDS OF OVERALL COMPANY PROGRAM

INTRODUCTION

The purpose of the Energy Risk Management Policy (RMP) document is to define the approach and internal rules that The Empire District Electric Company (EDE) will utilize to manage its natural gas commodity risk. The content of this document establishes and describes the EDE policy in assuming, assessing, and controlling the level of natural gas commodity risk exposure involved in the normal course of serving EDE's native load energy requirements.

OBJECTIVES

It is the policy of EDE NOT to engage in financial or commodity transactions unless they are related to underlying exposures related to supplying EDE's native load or to hedge back-to-back off-system transactions. It is the express intention of EDE to prohibit financial or physical commodity transactions that would reasonably be considered outside of EDE's core business activities.

The following are specific RMP objectives for EDE that represent a balanced financial and operational focus:

OBJECTIVE #1

Provide an organizational structure to support management goals and budget performance by mitigating energy price volatility and; hence, limiting fluctuations in the cost of supplying power to retail customers.

The RMP provides an organizational structure for effectively assessing and managing risk associated with EDE's natural gas supply and wholesale power activities. It provides a framework for effective control, audit, and reporting. The procedures set forth allow for the management of operational risks without placing undue restrictions on the operations of EDE.

OBJECTIVE #2

Allow utilization of physical and financial tools to provide a predictably priced reasonable cost gas-supply.

EDE's cost to generate, purchase, and supply power is greatly impacted by fluctuations in the market price of energy sources such as coal, natural gas, oil, and wholesale electricity. This RMP outlines procedures on how hedge positions will be employed to limit these market fluctuations in the price of natural gas and; hence, provide EDE with tools to manage expenses to generate, purchase, and supply power for its customer base.

2. RESPONSIBILITY FOR ENERGY RISK MANAGEMENT POLICY

The Officer Group as listed below is responsible for maintaining and overseeing the RMP:

The Officer Group is comprised as follows:

President and CEO
Vice President – Finance and CFO
Vice President – Energy Supply
Vice President – Regulatory and General Services
Vice President – Commercial Operations
Vice President – Nonregulated Services

From time to time, the Officer Group will report to the Board of Directors on the risk management activities surrounding natural gas risk. Officer Group activities shall include:

- Providing the Risk Management Oversight Committee (RMOC) authorization to engage in those activities consistent with prudent risk management and related trading practices which correlate with the native load requirements of EDE;
- Recognizing financial instruments such as futures, swaps, options, as well as physical market position management, can be effective transaction tools; and
- Providing sufficient management involvement, financial controls, and systems to monitor, report, and ensure the integrity of the RMP at all levels.

RISK MANAGEMENT OVERSIGHT COMMITTEE

The RMOC is charged to monitor aggregate risks and ensure they are managed in accordance with the RMP. The RMOC will meet periodically to assess aggregate risks and review EDE's market positions and exposures and strategy.

The RMOC is comprised as follows:

Chairman
Vice President – Finance and CFO

Members:

Vice President – Energy Supply
Vice President – Regulatory and General Services
Controller and Assistant Treasurer and Secretary
Director of Wholesale Energy Group

Internal Control Members:

President and CEO
Director of Internal Audit

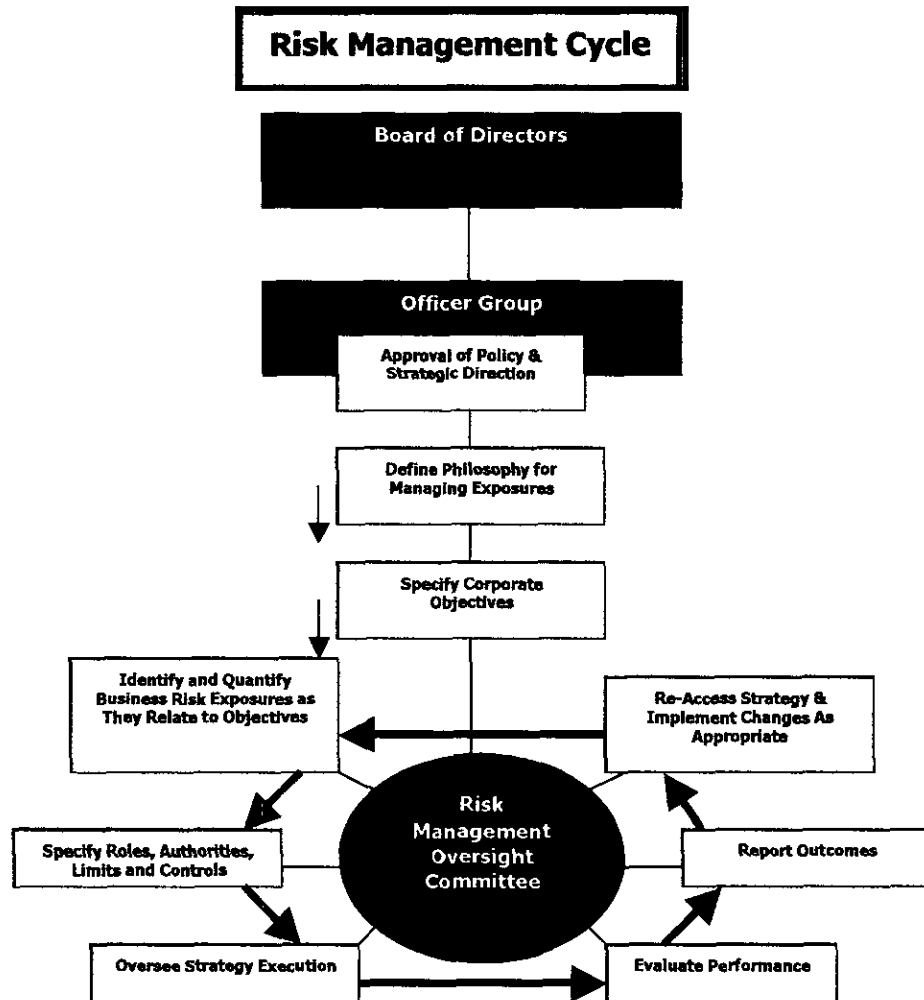
RMOC RESPONSIBILITIES

- **Approve Hedging Strategies** – Develop and approve strategies that achieve risk management objectives.
- **Individual Trading Authorization** – Approve a list of individuals authorized to establish trading relationships and execute trades. The hierarchy of oversight will include opening futures accounts, executing International Swap Dealer Association (ISDA) master agreements, placing futures orders, and entering into transactions per a master swap agreement.
- **Set Transaction Exposure Limits** – Approve limits on volumes and length of coverage of all outstanding physical, futures, options, and Over-the-Counter (OTC) positions.
- **Ensure Credit Approval and Documentation** – Measures will be established by September 1, 2002, for assessing counterpart creditworthiness. Counterparts will be reviewed at periodic intervals to ensure they have sufficient financial strength to meet their obligations.
- **Establish Procedures and Develop Reporting Systems** – Ascertain appropriate checks and balances are in place and financial reporting is correct.

Any member of the RMOC has authority to call committee meetings and the responsibility to ensure that all activities are in accordance with this program. The committee may meet in person, through telephone conference calls, and/or electronic mail. The RMOC secretary (who is not a member of the RMOC) will keep regular minutes and records of meetings and actions.

At any time a RMOC member believes the committee has failed to adequately address a situation in which the member believes price or credit speculation is taking place, that member shall submit a written statement describing the concern to the President and CEO or the Director of Internal Audit.

RMOC CYCLE



3 RISK

COMPANY EXPOSURE

EDE's exposure spans activity in both the physical fuels market and the financial derivative markets that have developed to accommodate natural gas and power. Without risk management, EDE will be subject to cost and pricing uncertainty, as well as uncertainty in meeting budgeted earnings and cash flow.

The primary components of EDE's risk exposure are operations risk, market risk, and credit risk. The RMP is designed to address the management of these risks in the aggregate.

OPERATIONS RISK

Involves the potential increased cost for items such as providing replacement power to serve customers due to the unscheduled outage of generation plants, interruptions of power purchases from other parties, or interruption of gas supply.

MARKET RISK

Involves the potential change in value of a commodity contract, liability, or cash flow caused by adverse fluctuations in market factors over a pre-defined holding period. Types of market risk include:

- **Price Risk** – Uncertainty associated with changes in the price level of commodity fuel costs.
- **Liquidity Risk** – Risk associated with the diminished market activity of a fuel commodity.
- **Volume Risk** – Supply or demand deviation from forecast (for example, the risk of not having enough or having too much natural gas to meet forecasted obligations). Volume risk is highly correlated with price risk because availability of wholesale electricity is high and price low when the weather is mild causing reduced volume need. Conversely, when weather is extreme causing an increase in our underlying needs, the price of wholesale electricity may increase exponentially.
- **Calendar Risk** – Exposure due to time differential in commodity value between actual physical delivery and financial position expiration.
- **Basis Risk** – Exposure due to a difference in commodity value between different delivery points or between cash market prices and the pricing points used in the financial markets.

COUNTERPARTIES/CREDIT RISK

A component of the overall RMP is the management of credit exposure. EDE's exposure is very different when transacting on the New York Mercantile Exchange (NYMEX) versus when transacting OTC.

The creditworthiness of trading partners or clearinghouses is a function of both qualitative and quantitative factors. Such factors are centered on the credit rating assigned to a company by major credit rating services and an evaluation of the company's ability to financially meet its obligations to EDE. Typical sources of credit-related information are credit rating reports (published by one or more of the commonly recognized rating agencies, such as Dunn & Bradstreet, Standard & Poor's, or Moody's), general market intelligence, electronic news releases, and other public information sources. Based on these resources, EDE will assign an internal credit rating to use in assessing the viability of potential trading partners.

Credit risk associated with maintaining an account with a futures clearinghouse is considerably less than that with OTC counterparts. This distinction exists because the collective clearinghouse members of NYMEX, which includes virtually every major energy company and financial institution in the country, guarantee the performance on all positions placed on the exchange. Requiring margin deposits and daily mark-to-market by clearinghouse members allows for incremental monitoring and control of transactions and eliminates the potential for sudden defaults on contracts.

ESTABLISHING CREDIT RESPONSIBILITIES

Establishing limits and creditworthiness monitoring will be done independent of the trading function and will be performed by the Risk Management Accountant in Finance in order to guarantee appropriate segregation of duties within EDE. All trading activity with a particular counterpart who no longer meets EDE's credit standards will be halted. A Counterpart Credit Analysis Report will be included as part of the weekly Position Report described later. The report will summarize the total amount of outstanding credit, categorized by individual counterpart and by composite credit rating. A Credit Limit Flowchart is included in this policy as Appendix 1 and Appendix 2, respectively.

4. HEDGE STRATEGY

EDE's Missouri and Kansas retail rates are not subject to a fuel cost adjustment clause. As such, the only time EDE's rates are adjusted for changes in fuel costs is during a rate proceeding. The regulatory schedule for a rate proceeding in Missouri requires 11 months from the date of filing before new rates come into effect. Adding preparation time for a rate case, this period could stretch to 12 or 13 months. This regulatory schedule combined with the volatility of natural gas necessitates that EDE focus on procuring fuel over periods longer than 18 months to help prevent EDE's revenues from lagging its costs.

EDE's strategic focus addresses both the regulatory structure and volatility by attempting to protect against volatile natural gas costs for EDE plants. To best utilize the economic trade-offs between generating with on-system resources versus buying non-firm wholesale power, EDE will apply risk management strategies. EDE will attempt to lessen the risks associated with variances in the volume of fuel consumed relative to budgeted fuel consumption volume.

EDE's specific hedge strategy goals are as follows:

- Provide for predictable fuel and purchased power costs over a multi-year period;
- Minimize fuel and purchased power costs to serve retail load;
- Maximize margin on off-system sales opportunities; and
- Provide framework to allow EDE to manage its risk positions.

EDE's RMP is designed to provide Wholesale Energy Group with a more comprehensive set of tools to mitigate the adverse impacts associated with changing natural gas or wholesale electricity prices.

EDE's risk management strategies involve an active and continual "mark-to-market" assessment of market conditions to match its supply portfolio to its portfolio of retail and wholesale obligations.

In effect, these strategies set out to determine how much market risk is reasonable to best minimize costs and volatility, while still providing EDE's customers with reasonable fuel costs.

An overview of the hedging targets for natural gas is outlined below.

NATURAL GAS

At least yearly, EDE will model its electric system with a production cost model to establish an expected gas burn for retail load for each of the next four years. This budgeted gas burn will be the same as that utilized in EDE's financial projections.

From time to time as conditions change (i.e. unit outages, gas commitments, purchase power commitments), the Wholesale Energy Group shall re-model EDE's system to establish a new "expected" gas burn for native load.

EDE will utilize the following procurement guidelines:

- Hedge 0% - 20% of year four expected gas burn
- Hedge 20% - 40% of year three expected gas burn
- Hedge 40% - 60% of year two expected gas burn
- Hedge 60% - 80% of year one expected gas burn.

(By December 31 of current year we should have 60-80% of the next years projected gas burn hedged.)

This progressive dollar cost averaging approach is intended to protect our customers and shareholders from volatility in the marketplace. In addition, the progressive approach allows for increasing uncertainty of gas needs inherent in forecasting events occurring further in the future.

If changes in expected gas burns occur that make us more than 100% hedged, immediate steps will be taken to reduce our hedged position to 100% or less.

5. INTERNAL CONTROLS

Internal controls are essential in ensuring adherence to the RMP and include the authorization of acceptable instruments, limits, and credit standards. Additional checks and balances including segregation of departmental duties, market

position monitoring, and a management reporting structure should be in place to verify and reconcile the integrity of EDE's risk management activity results.

SEGREGATION OF DEPARTMENTAL RESPONSIBILITIES

An appropriate segregation of duties is fundamental in controlling EDE's risk management operations and includes activities such as approvals, verifications, and reconciliations. A clear separation between transacting, credit review and approval, margining and cash settlements, and accounting has been established with respect to the RMP.

Wholesale Energy Group, Finance, and Internal Audit are the departments most directly impacted by energy supply risk management activities.

AUTHORIZATION PARAMETERS

INSTRUMENTS

A primary responsibility of the RMOC is the review and approval of tools acceptable for implementation of the risk management strategy.

The various hedging instruments that EDE is authorized to use by this RMP are described as follows:

- **Physical Contract** – Contract for future delivery of a designated quantity of a fuel source or power supply at a designated price, time, and location. Physical forward contracts obligate both the buyer and seller to accept the agreed-upon price, regardless of the market price when the delivery takes place.
- **Futures Contract** – Standardized binding agreement to buy or sell a specified quantity or grade of a commodity at a later date. Futures contracts are freely transferable, can be traded exclusively on regulated exchanges, and are settled daily based on their current value in the marketplace.
- **Option** – Contract giving the holder the right, but not the obligation, to purchase or sell the underlying futures contract at a specified price within a specified period of time in exchange for a one-time premium payment. The contract also requires the writer, who receives the premium, to meet these obligations. (Use of these instruments in a manner that precludes them from falling under hedge accounting treatment is prohibited.)
- **OTC Instrument** – Any financial or physical instrument that is customized and created by a counterpart to replicate the risk profile associated with a commodity. The OTC swap tool allows two parties to fix price without physical quantity, and period. There is a monthly settlement price, which is the difference between the fixed price of the contract and the index price in the publication for that month's date. If the index price for the delivery period is higher than the fixed price of the OTC contract, then the seller pays the buyer the difference. If the index price is lower, the buyer pays the seller the

difference. This policy approves the use of OTC forwards and options for natural gas and power. Power examples include: 5x16, 7x24, 5x8, 2x24, 7x8, 1x16, etc. (Use of these instruments in a manner that precludes them from falling under hedge accounting treatment is prohibited.)

LIMITS

AUTHORIZED TRADERS AND TRADING LIMITS

- **"Round Trip" Trades Prohibited** – "Round trip" transactions shall be strictly prohibited. Round trip transactions, as used herein, refers to simultaneous (or nearly simultaneous) energy purchases and sales of equal duration, price and volume. Employees engaging in such transaction shall be subject to progressive discipline up to and including termination of employment.

Authorized traders, along with approval and transaction limits, are listed in Appendix 12.

6. REPORTING POSITION REPORT

The Position Report contains a list of all open and recently closed transactions for EDE trade-based activity and serves as a crucial element of RMP control and management. The Position Report has multiple applications for risk management review that includes account transaction tracking and evaluation as well as overall performance evaluation.

The Position Report is updated and distributed weekly by Wholesale Energy Group (WEG). Its primary objectives are:

- Allow for marking individual transactions to market;
- Provide data for transactions as well as portfolio analysis; and
- Simplify accounting and program results evaluation through analysis of the closed positions list.

MARK-TO-MARKET

All positions will be mark-to-market (using the appropriate NYMEX prices or other suitable market indicator) weekly or as determined by the RMOC on the Position Report by Wholesale Energy Group. This analysis is performed to appropriately reflect the current value and cash flows associated with open positions and to provide timely information regarding EDE's market risk and exposure.

The Wholesale Energy Group is responsible for verifying the validity of the market data used in mark-to-market calculations through the Position Report, with Finance performing a subsequent review as a check on this report's accuracy. On certain OTC positions, it may be difficult to obtain an accurate mark-to-market value. In these instances, Wholesale Energy Group will provide

the most precise estimate of values and will identify the source and reliability of the data.

ADDITIONAL MANAGEMENT REPORTING

Management reports are to be based on the principles of: adequate compliance limit monitoring, accuracy of data sources, and frequency and quality of information. All reports should communicate the price risks assumed by EDE. Information pertaining to performance measurement and program evaluation will be included in required reports and will be used as a basis for RMOC discussions and future strategy setting.

MINIMUM REPORTING REQUIREMENTS

The following table identifies the various reports to be generated by different departments or management levels, the normal regularity, and circulation of the document.

Report	Distribution	Normal Frequency	Originator
Position Report	WEG Risk Mgt. Acct. RMOC	Weekly and Quarter-End	WEG
Account Statements via email	WEG Risk Mgt. Acct. RMOC	Monthly - RMOC Daily - Others	RMI
Minutes of RMOC Meetings	RMOC	Monthly	RMOC Secretary
Counterpart Credit Analysis	RMOC WEG	Weekly	WEG (as reviewed by Risk Mgt. Acct.)

DISCIPLINE

Any violation by an employee of the RMP will be subject to the Progressive Discipline Policy as outlined in the Personnel Policy Manual of EDE.

7. POLICY REVIEW

On a periodic basis, the RMOC will review and mutually make a recommendation to the Officer Group on the adequacy of the RMP and any necessary changes.

8. CONFLICTS OF INTEREST

Personnel responsible for executing and managing EDE's trading activity will not be authorized to enter into energy-related commodity transactions on behalf of others or themselves unless specifically approved by the RMOC.

9. DUTIES AND WORK FLOW

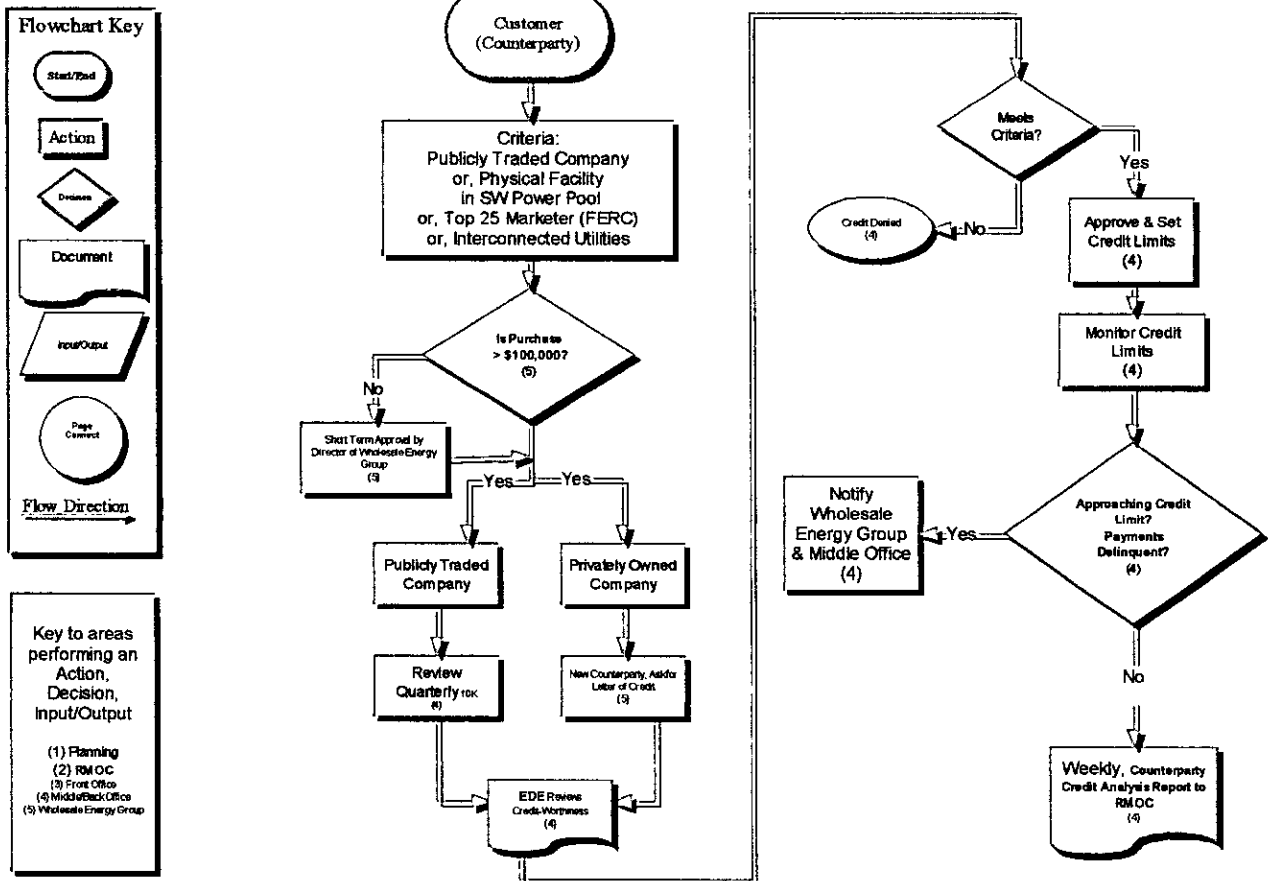
Appendices are listed as follows:

- **Credit Limits Flowchart – Appendix 1**
- **Duties for Wholesale Energy Group – Appendix 2**
- **Duties for Finance – Appendix 3**
- **Duties for Auditing – Appendix 4**
- **Work Flow to Execute Trade – Appendix 5**
- **Procedure for Hedge Transactions and Reconciliation – Appendix 6**
- **Trade Ticket – Appendix 7**
- **Confirmation Procedure – Appendix 8**
- **Position Report – Appendix 9**
- **Mark to Market Report – Appendix 10**
- **Broker Account Statement – Appendix 11**
- **Authorized Traders – Appendix 12**

APPENDIX 1

CREDIT LIMIT FLOW CHART

Wholesale Energy Group - Credit Limits Flowchart

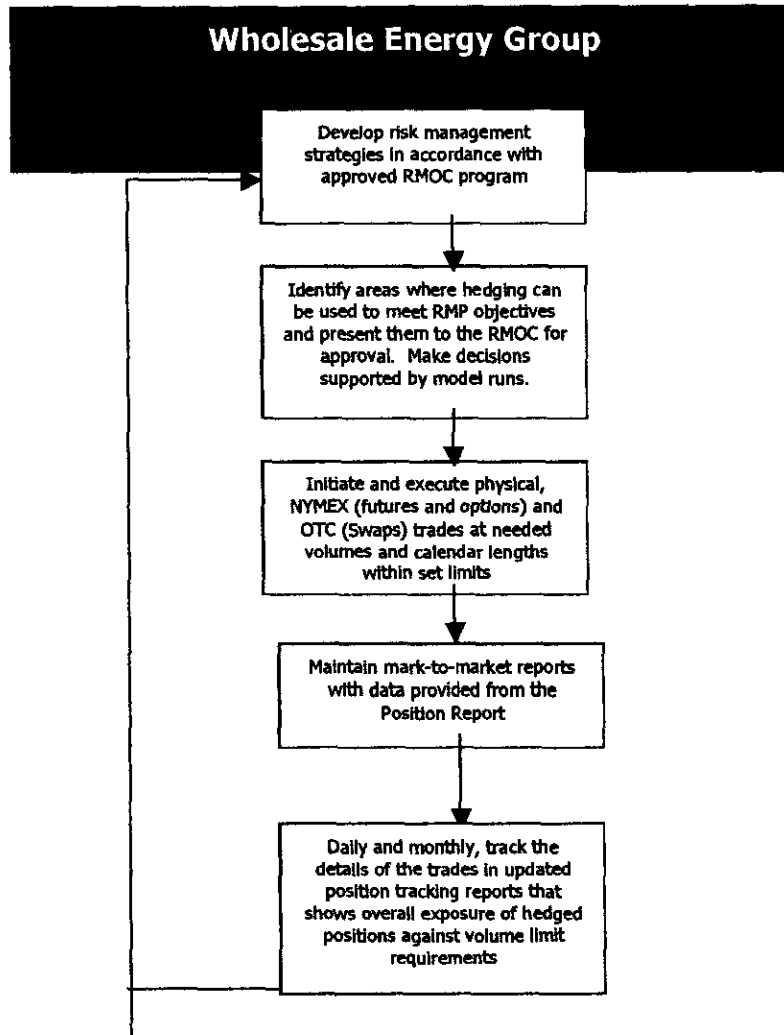


APPENDIX 2

WHOLESALE ENERGY GROUP

Responsible for analyzing the market and developing appropriate strategies and tactics in line with the RMP.

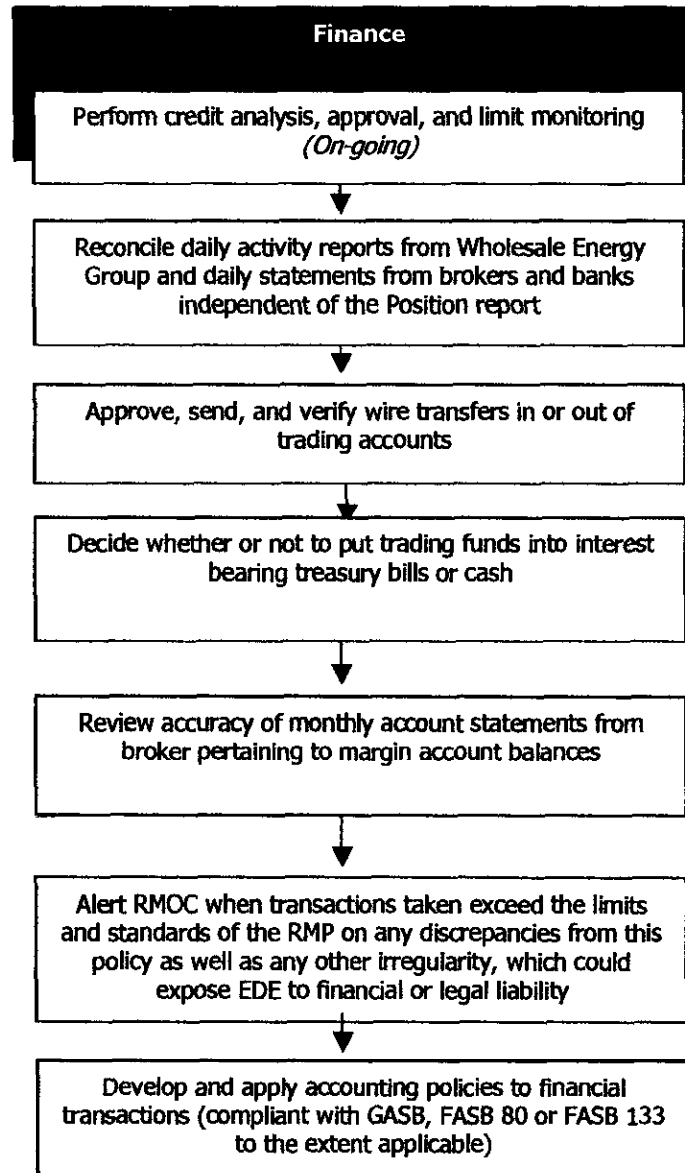
Responsibilities include the following:



APPENDIX 3

FINANCE

Responsible for the provision of financing Wholesale Energy Group hedge transactions. In addition, Finance will crosscheck hedge positions placed by Wholesale Energy Group in physicals, swaps, futures, and options for accuracy and accordance with EDE's RMP. Accountable for review of account balances for any associated margin requirements with day-to-day activity and also responsible for the following:



APPENDIX 4

INTERNAL AUDIT

Review documentation as needed to verify the RMP defined limits of EDE hedge transactions and operations and will periodically confirm the internal controls in place are effective in protecting the objectives of EDE's risk management program.

APPENDIX 5

FOR ANY HEDGE TRANSACTION

(Physical, Exchange-Traded or OTC)

**Please reference appendix 7 for a graphical representation of this process*

DAILY

1. Monitor Market Prices/Identify Need for a Hedge in line with Hedging Strategy Objectives

- ✓ Wholesale Energy Group will monitor prices for opportunities to meet RMP hedge goals and objectives.

2. Determine Best Strategy within Limits to Achieve Hedging Objective

- ✓ Within the RMOC approved limits, Wholesale Energy Group will determine the best hedge strategies to implement in line with objectives.
- ✓ For any chosen strategies that exceed a specified time period or dollar limit, the Vice President – Energy Supply must verify that the chosen hedge transaction meets objectives.

3. Confirm Counterparty Meets Credit Requirements

- ✓ For an OTC transaction, the prospective counterparty must be crosschecked with Finance counterparty credit list for credit verification.

4. Implement Transaction

- ✓ Wholesale Energy Group prepares internal documentation for current order.

5. Communicate Order

- ✓ Wholesale Energy Group executes a hedge with broker and/or counterpart by picking up the phone and calling in information that is simultaneously recorded via a trading ticket (*reference "Ticket Input Illustrations" in next section*) which is date/time stamped and entered into a position tracking report.

6. Broker Documents and Executes Transaction

- ✓ In addition, the broker and the NYMEX floor representatives keep their own trading tickets to document the transaction.

7. Verify Transaction (Verbal and Written)

- ✓ Broker and/or counterpart verifies hedge fill via phone initially to Wholesale Energy Group.
- ✓ Written confirmations will be sent to Wholesale Energy Group and Finance the following business day via e-mail or fax.

8. Confirm Accuracy of Transaction

- ✓ Wholesale Energy Group crosschecks daily broker Account Statement confirmations against internal Position Report for accuracy
- ✓ Wholesale Energy Group provides mark-to-market reports that tracks the value of the hedge based on current market price.

9. Track Positions

- ✓ This Wholesale Energy Group Position Report is forwarded to Finance as a check for accuracy on market value and is compared to the broker daily Account Statement report.

10. Reconcile Positions Daily with Broker via Finance

- ✓ On a daily basis, Finance will determine and verify cash flow receipts and obligations. If EDE is on margin call, funds will be wired to the broker to keep the hedge account equity in line with the current market value.

MONTHLY AND ON-GOING

1. Reconcile Monthly Account Statements

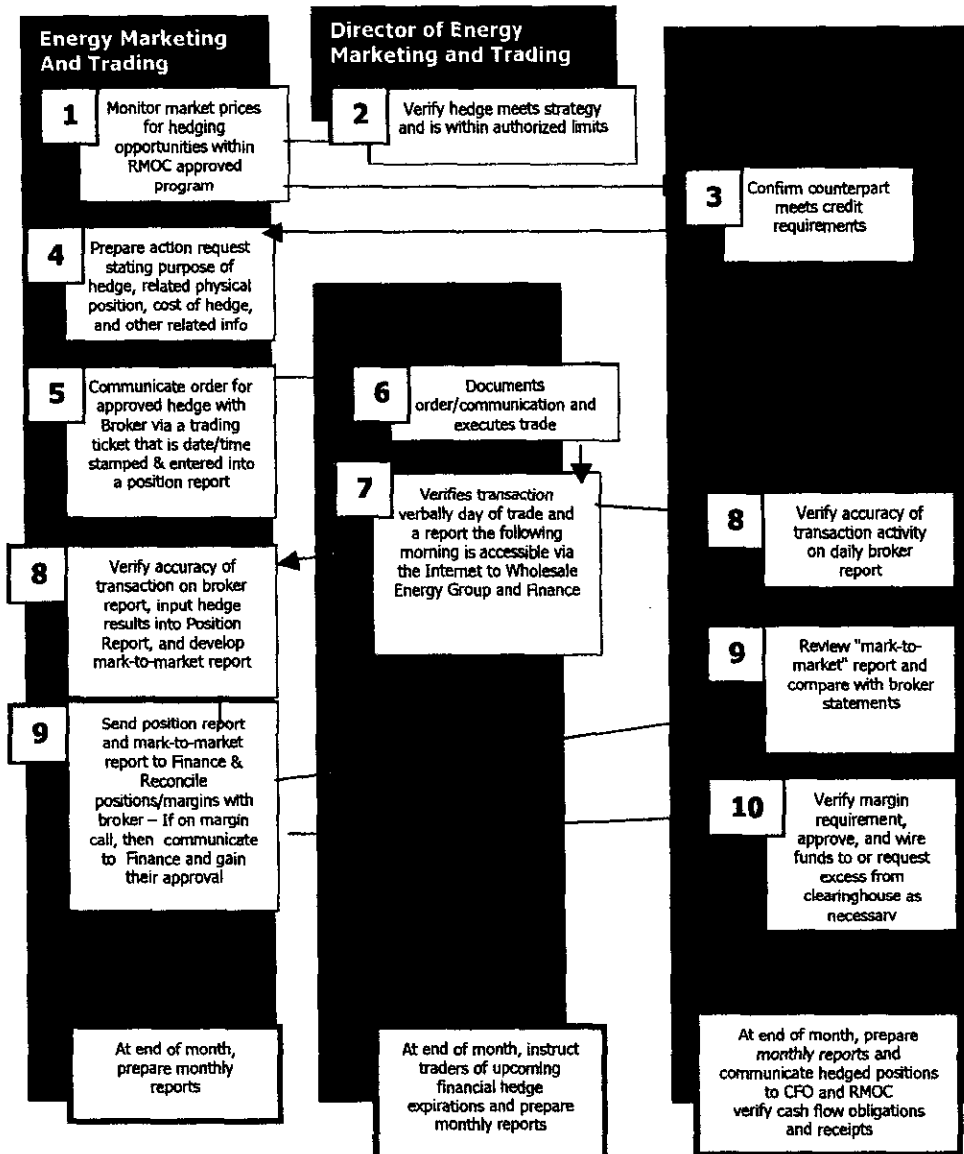
- ✓ Finance reconciles broker and/or counterpart statements with internal Position Report.

2. Review of Transaction/Reporting

- ✓ On a monthly basis, Wholesale Energy Group will review with the RMOC the strategy and positions taken. On a semi-annual basis, the results of the RMP hedge strategy will be reported to the Audit Committee by the RMOC.

APPENDIX 6

PROCEDURAL FLOW FOR HEDGE TRANSACTIONS & RECONCILIATION



****Internal Audit will periodically review process to verify accuracy and compliance***

APPENDIX 7

TRADE TICKET

The ability to internally track hedge transactions is crucial to providing an audit trail whereby all parties involved in the decision-making process are notified of a hedge position. This notification of a transaction is also the primary document in tracking a hedge and providing information for the Position Report. Included in the document will be the volumes hedged, the price or instrument used, the length of time for the hedge, and the counterpart to the transaction. Internal Trade Transaction Ticket(s) are included on the following pages.

Incentive Copy

Energy Trade Confirmation Sheet

Trader:

Trade Ticket Number

Date 4/1/2002

A

PSE:

Path:

HEMW	\$	Cost \$	\$	MW	\$
0100		0		0.00	
0200		0		0.00	
0300		0		0.00	
0400		0		0.00	
0500		0		0.00	
0600		0		0.00	
0700		0		0.00	
0800		0		0.00	
0900		0		0.00	
1000		0		0.00	
1100		0		0.00	
1200		0		0.00	
1300		0		0.00	
1400		0		0.00	
1500		0		0.00	
1600		0		0.00	
1700		0		0.00	
1800		0		0.00	
1900		0		0.00	
2000		0		0.00	
2100		0		0.00	
2200		0		0.00	
2300	25	17.00	425	25	13.00
2400	25	17.00	425	25	13.00
02AA		0			0.00
Totals	50	850.00		650.00	
		17.00			

Comments:

Economy Sale to Company 1

Net Margin:

200.00

Deal type:

Economy sale/Company 1

Fax or Voice Confirmation

Eligible for Incentive (Y/N):

Margin:

Avoided Unit: Asbury

Avoided Unit Cost: \$/MWH

Incentive amount:

Supervisor's initials:

Empire District Electric Company Internal Trade Transaction Ticket				Trade Ticket No.	S33
				Trade Date	16-Jun-02
				Trade Time	11:30 AM
Buy/Sell Sell	Instrument Physical	Type Normal	Strike Price Premium	Market OTC	
Location	Quality n/a	Delivery Start Date 14-Jun-02	Exercise Date n/a		
		Delivery End Date 17-Jun-02	Settlement Date 01-Jul-02		
	Price Differential / Basis		Volumetric Rate	Quantity	
Price Type Fixed	2.7		Total Qty	8,334 MMBtu	
				(33,336 total)	

Transmission/Transport Charges		Scheduling Requirement	
Counterparty	Mark-to-Market Point	Broker Commission	
General Comments			
Energy Trader: Sam Ellis			
Energy Trader's Initial _____			
Transaction Objective Based on Empire's Risk Management Policy			
Not planning on utilizing some baseload purchase over the weekend, and we are selling to honor Williams pipeline reliability notice dated June 13, 2002, asking that pipeline users do not schedule deliveries in excess of receipts through this coming weekend.			
Middle Office - Risk Management	_____ Doug Gallemore		
Back Office - Accounting	_____ Doug Gallemore		
Back Office - Tax Accounting	_____ Jay Williams	This Transaction complies with: Ordinary Property Obligations (IRC Section 1221 (a)(6))	
		Identification Requirements (Treas. Regs. Section 1.1221-2(e))	
Distribution:	Energy Trading Risk Management Tax Accounting Treasury		

APPENDIX 8

CONFIRMATION PROCEDURE

Exchange Traded Confirmations

Wholesale Energy Group will verbally confirm every transaction with broker and/or counterpart on the trade date. Trade confirmations on the daily open position statements will be sent by the broker (on the following business day) to Wholesale Energy Group and Finance. Wholesale Energy Group must check for accuracy on the following business day, input updates into the position report, maintain a mark-to-market report, and forward said report to Finance. Finance is responsible for verifying the confirmation against the transacting records.

Physical and OTC Financial Confirmations

Wholesale Energy Group must verbally confirm every transaction with the broker/counterpart on the trade date. For physical and financially settled OTC transactions, written or email confirmations of the applicable business terms and conditions will be completed by Wholesale Energy Group and forwarded to Finance by the end of the second business day following the trade day. Finance is responsible for verifying the confirmation against the transacting records.

The following procedures will be adhered to at all times:

- The trader will review a copy of the confirmation for completeness and initial the confirmation.
- Confirmations will be completed, signed, and sent to the counterpart by Finance within two business days.
- Original tickets and confirmations will be kept by Finance until after the transaction has settled. Once the transactions have settled, the confirmations and tickets will be maintained.

APPENDIX 9

POSITION REPORT

Empire District Electric
Gas Position Summary as of Aug 20, 2001

	August	September 12 Days Out	October 42 Days Out	Nov-Dec 73 Days Out	Year 2002	Year 2003	Year 2004	Net All Years
Budget Dth	1,906,044	1,321,724	1,456,044	2,933,327	13,577,600	14,296,600	14,512,000	50,003,339
Expected Dth	1,906,044	1,321,724	1,456,044	2,933,327	13,577,600	14,296,600	14,512,000	50,003,339
Policy minimum hedged Dth (3)	1,428,533	991,293	582,418	0	8,146,560	5,718,640	2,902,400	19,770,844
Policy maximum hedged Dth	1,906,044	1,321,724	873,626	586,666	10,862,080	8,577,960	5,804,800	29,932,900
Amount Hedged from Upside Volatility Dth	1,750,000	1,000,000	590,000	400,000	6,200,000	1,200,000	0	11,140,000
percentage	92%	76%	41%	14%	46%	8%	0%	22%
Amount Hedged from Downside Volatility Dth	1,950,000	1,200,000	590,000	400,000	6,200,000	1,200,000	0	11,540,000
percentage	102%	91%	41%	14%	46%	8%	0%	23%
Bookout per physical Dth, all positions	3.541	3.341	3.110	N/A	3.780	3.875	N/A	3.704
Net All Positions Marked to Market \$ (1)	(654,850)	(160,550)	59,000	(364,000)	(349,800)	25,600	-	(1,444,600)
PHYSICAL HEDGES								
Purchased Dth (2)	1,750,000	1,000,000	590,000	0	5,600,000	1,200,000	0	10,140,000
Purchased \$	6,170,100	3,304,750	1,834,900	-	20,728,000	4,650,000	-	36,885,750
Purchased \$/Dth	3.526	3.305	3.110	0.000	3.701	3.875	0.000	3.618
Market \$	5,542,250	3,180,000	1,893,900	-	20,819,000	4,675,600	-	36,110,750
Market \$/Dth (on Henry Hub)	3.167	3.180	3.210	0.000	3.718	3.896	0.000	3.561
Gain/(Loss) versus current market	(627,850)	(124,750)	59,000	-	93,000	25,600	-	(575,000)
FINANCIAL HEDGES								
Swap Dth	0	0	0	400,000	600,000	0	0	1,000,000
Swap Strike \$/Dth	0.000	0.000	0.000	4.485	4.485	0.000	0.000	0.000
Market \$/Dth (at Henry Hub or Swap location)	0.000	0.000	0.000	3.675	3.747	0.000	0.000	0.000
Swap Settlement - Receipt / (Payment)	-	-	-	(364,000)	(442,800)	-	-	(806,800)
Call Dth (Buy a Call)	0	0	0	0	0	0	0	0
Call Strike \$/Dth	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Market \$/Dth (at Henry Hub or Swap location)	0.000	3.180	3.210	0.000	3.718	3.896	0.000	0.000
Cost of Call \$/Dth	0.000	0.000	0.000	0.0000	0.000	0.000	0.000	0.000
Value \$ of Call Position	-	-	-	-	-	-	-	-
(Cost) \$ of Call Position	-	-	-	-	-	-	-	-
Collar Dth	-	-	-	-	-	-	-	0
Floor \$/Dth	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Ceiling \$/Dth	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Market \$/Dth (at Henry Hub or Swap location)	0.000	0.000	0.000	0.000	0.000	3.896	0.000	0.000
Cost of Floor \$/Dth	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Value of Ceiling \$/Dth	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
(Cost) / Value \$ of Collar Position	-	-	-	-	-	-	-	0
Put Dth (Sell a Put)	200,000	200,000	0	0	0	0	0	400,000
Put Strike \$/Dth	3.500	3.500	0.000	0.000	0.000	0.000	0.000	0.000
Market \$/Dth (at Henry Hub or Swap location)	3.167	3.128	0.000	0.000	0.000	0.000	0.000	0.000
Revenue from Put \$/Dth	0.198	0.193	0.000	0.000	0.000	0.000	0.000	0.000
Value \$ of Put Position	-	-	-	-	-	-	-	-
(Cost) \$ of Put Position	(27,000)	(35,800)	-	-	-	-	-	(62,800)

Note 1: Market data using NYMEX Open Prices as of August 20, 2001.

Note 2: A counterparty exercised the August put option for 170,000 Dth. Net cost for the transaction is \$3.80 and is included in physical commodity.

Note 3: Policy minimums for years 2002-2004 are 12/31/2001 hedging targets.

APPENDIX 10

MARK-TO-MARKET REPORT

As mentioned previously, all positions will be "mark-to-market" (using the appropriate NYMEX prices) weekly. This analysis is performed by Wholesale Energy Group to appropriately reflect the current value and cash flows associated with open positions and to provide timely information regarding EDE market risk and exposure. Wholesale Energy Group is responsible for verifying the validity and accuracy of the market data used in mark-to-market calculations through the position report on a daily basis.

Following is an example of the mark-to-market report: (Replace with one from Position Report.

MARK-TO-MARKET REPORT								
Report Date:		04/03/2001						
Period	Instrument	Counterparty	Trade Date	Days in Month	MMBtus Purchased Per Month	Fixed Price	NYMEX Futures Market Price	Gain/Loss
2001								
May 2001	Future	NYMEX	10/15/2000	31	10,000	5.000	5.115	1,150
June 2001	Future	NYMEX	10/15/2000	30	10,000	4.950	5.160	2,100
June 2001	Future	NYMEX	11/20/2000	30	10,000	4.900	5.160	2,600
July 2001	Future	NYMEX	11/20/2000	31	10,000	5.300	5.210	(900)
July 2001	Future	NYMEX	10/15/2000	31	10,000	5.200	5.210	100
July 2001	Future	NYMEX	02/15/2001	31	10,000	5.100	5.210	1,100
August 2001	Future	NYMEX	11/01/2000	31	10,000	5.100	5.237	1,370
August 2001	Future	NYMEX	11/15/2000	31	10,000	5.050	5.237	1,870
August 2001	Future	NYMEX	03/01/2001	31	10,000	5.000	5.237	2,370
September 2001	Swap	Dynegy	11/01/2000	30	100,000	4.800	5.213	41,300
September 2001	Future	NYMEX	11/15/2000	30	10,000	4.750	5.213	4,630
October 2001	Swap	Enron	11/01/2000	31	100,000	4.900	5.217	31,700
November 2001	Future	NYMEX	11/01/2000	30	10,000	5.200	5.330	1,300
November 2001	Swap	Enron	03/01/2001	30	50,000	5.250	5.330	4,000
December 2001	Future	NYMEX	11/01/2000	31	10,000	5.100	5.440	3,400
December 2001	Swap	Dynegy	03/01/2001	31	50,000	5.200	5.440	12,000

APPENDIX 11

DAILY BROKER ACCOUNT STATEMENT

The RMI Account Statement shown below is an illustration of the daily report that Wholesale Energy Group and Finance can access on the Internet and will receive a hard copy via US mail from the broker to verify and confirm the previous day's trading activities:

MIDAS 4.0 <small>A Product of Man Financial</small> Help									
eMIDAS	Reports	Query	Snapshots	Tools	Logoff	not financial.com			
Apr 2001	2/20/01	F1	1			2.880	X US	24,350.00	
	2/20/01	F1	1			4.970	US	290.00	
	3/12/01	F1	1			4.900	US	990.00	
	3/21/01	F1	2			5.036	US	740.00DR	
	3/22/01	F1	1			5.050	US	510.00DR	
	5/23/01	F1	1			5.040	US	410.00	
			10 *	1 *		4.999	**	127,580.00	*
						AVG LONG 3.727	AVG SHORT 5.040		
	3/08/01	F1	2			CALL MAR 02 NY NAT GAS 6350	.490	US	9.6
	2/25/02-X		2 *	*		.7 DO .370 DF CLOS PRICE	.483	**	9.6
						AVG LONG .490			
	3/30/99	F1	2			APR 02 NY NATURAL GAS	2.395	X US	44,040.00
	5/17/99	F1	1			APR 02 NY NATURAL GAS	2.441	X US	20,960.00
	9/28/99	F1	1			APR 02 NY NATURAL GAS	2.575	X US	19,620.00
			4 *	*		CLOSE PRICE	4.537	**	94,620.00 *
						AVG LONG 2.421			
	4/29/99	F1	1			MAY 02 NY NATURAL GAS	2.400	X US	20,220.00
	6/30/99	F1	1			MAY 02 NY NATURAL GAS	2.410	X US	20,120.00
			2 *	*		CLOSE PRICE	4.422	**	40,340.00 *
						AVG LONG 2.405			
	5/28/99	F1	1			JUN 02 NY NATURAL GAS	2.420	X US	20,070.00
			1 *	*		CLOSE PRICE	4.427	**	20,070.00 *
						AVG LONG 2.420			
	9/02/99	F1	1			SEP 02 NY NATURAL GAS	2.475	X US	19,760.00
			1 *	*		CLOSE PRICE	4.451	**	19,760.00 *
						AVG LONG 2.475			
	9/30/99	F1	2			OCT 02 NY NATURAL GAS	2.570	X US	37,640.00
			2 *	*		CLOSE PRICE	4.452	**	37,640.00 *
						AVG LONG 2.570			
	2/23/01	F1	1			NOV 02 NY NATURAL GAS	4.520	US	470.00
	2/27/01	F1	1			NOV 02 NY NATURAL GAS	4.550	US	170.00
			2 *	*		CLOSE PRICE	4.567	**	640.00 *
						AVG LONG 4.535			
	2/23/01	F1	1			DEC 02 NY NATURAL GAS	4.620	US	460.00
	2/27/01	F1	1			DEC 02 NY NATURAL GAS	4.650	US	150.00
			2 *	*		CLOSE PRICE	4.665	**	600.00 *
						AVG LONG 4.635			
						WTY PUT: 246.5			
CONVERSION TO US									
						191,415.45DR ACB	1,686,600.00	OTF	.00
						364,827.55 N/E	364,827.55	WF	.00
						.00 LIN	15,540.00DR	SIN	15,540.00DR
						.00 ULV	.00	USV	181,415.45DR
							.00	COE	.00
									246.5
									1,594,074.55
									82,090.00
									1,169,247.00
									966,109.1
									181,415.1

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APPENDIX 12

TRADING AUTHORIZATION

	<u>Physical Power Purchases and Sales</u>	<u>Other Physical and Financial Transactions</u>
Rick McCord	Up to 2 years and \$5 million	Up to 2 years and \$5 million
Katie Barton	Next 7 days and up to \$5 million	Next 7 days and up to \$5 million
Sam Ellis	Next 7 days and up to \$5 million	Next 7 days and up to \$5 million
Greg Sweet	Next 7 days and \$5 million	Next 7 days and up to \$5 million
Karl Doner	Next 3 days	None
John Deffenbaugh	Next 3 days	None
Jim Graham	Next 3 days	None
Bob Hallam	Next 3 days	None
Kenny Myers	Next 3 days	None
Jim Johnston	Next 3 days	None
Mike Stuart	Next 3 days	None

- The persons listed above are authorized only to engage in the types of transactions specifically approved by the RMOC and the Energy Risk Management Policy.
- Although system dispatchers should do whatever is necessary to ensure system reliability, they should immediately notify the Director of Wholesale Energy in the event they enter into a single transaction exceeding \$250,000 in a calendar day.
- Transactions of duration greater than two (2) years and less than \$5 million must be approved by the Vice President – Energy Supply.

Transactions greater than \$5 million must be approved by the RMOC or, in the event the RMOC cannot meet, by at least two-thirds (2/3) of Senior Officers appointed to the RMOC.

WILLIAMS GAS PIPELINES CENTRAL, INC.
ORIGINAL

PAGE 1

IN ACCOUNT WITH:

INVOICE ID: 1-TWS-0602-01511

01511
EMPIRE DISTRICT ELECTRIC CO
ATTENTION: KATIE BARTON
602 JOPLIN STREET
P. O. BOX 127
JOPLIN, MO 64802-0000

INVOICE DATE: 07/11/2002

FOR THE MONTH OF: 06/2002

DUE DATE: 07/21/2002

TRANSPORTATION CHARGE PURSUANT TO CONTRACT 1TA0907

\$ 164,983.65

TRANSPORTATION CHARGE PURSUANT TO CONTRACT 1TAS251

\$ 303,185.53

INVOICE TOTAL AMOUNT

\$ 468,169.18

FOR QUESTIONS CONCERNING THIS INVOICE OR STATEMENT PLEASE CONTACT SCOTT LAMAR
CUSTOMER SERVICE ACCOUNTING 1-270-688-6471 (IN-OWENSBORO)

** INTEREST WILL BE CHARGED ON PAST DUE BALANCES **

REMITTANCE ADDRESS:
WILLIAMS GAS PIPELINES CENTRAL, INC.
P.O. BOX 94174
TULSA, OK 74194-0000

ELECTRONIC FUNDS TRANSFER ADDRESS:
CITIBANK, N.A.
ABA#: 0-210-0008-9
A/C#: 4056-5372
NEW YORK, NY

WILLIAMS GAS PIPELINES CENTRAL, INC.
REMITTANCE PAGE - ORIGINAL

PAGE 3

01511
EMPIRE DISTRICT ELECTRIC CO
ATTENTION: KATIE BARTON
602 JOPLIN STREET
P. O. BOX 127
JOPLIN, MO 64802-0000

INVOICE ID: 1-TNS-0602-01511

INVOICE DATE: 07/11/02

FOR THE MONTH OF: 06/2002

DUE DATE: 07/31/2002

AMT DUE

\$ 468,169.18

CURRENT INVOICE AMOUNT

CHECK AMOUNT

VOLUNTARY GRI CONTRIBUTION: AMOUNT: _____

PROJECT OR PROJECT AREA TO BE FUNDED: _____

DOCUMENT DISPUTES

INVOICE ID	LINE NUMBER	INVOICED AMOUNT	QUANTITY	UNIT PRICE	DISPUTE RATE	PROJECT OR PROJECT AREA TO BE FUNDED	
						DISPUTE QUANTITY	DELIVERY LOCATION
_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____

PLEASE RETURN THIS PAGE WITH PAYMENT

FOR QUESTIONS CONCERNING THIS INVOICE OR STATEMENT CONTACT
CUSTOMER SERVICE ACCOUNTING
SCOTT LAMAR 1-270-688-6471 (IN-OWENSBORO)

REMITTANCE ADDRESS:
WILLIAMS GAS PIPELINES CENTRAL, INC.
P.O. BOX 94174
TULSA, OK 74194-0000

ELECTRONIC FUNDS TRANSFER ADDRESS:
CITIBANK, N.A.
ABA#: 0-210-0008-9
A/C#: 4056-5372
NEW YORK, NY

TRANSPORTER: EMPIRE DIST ELC
TA0907 - FTS - PRODUCTION

01511

WILLIAMS GAS PIPELINES CENTRAL, INC.
CHARGE SUMMARY STATEMENT
FOR THE MONTH OF: JUNE 2002

PAGE 4
07/11/2002 11:07:27

LINE NO.	CHARGE TYPE	CONTRACT NUMBER DELIVERY LOC	RA CONTRACT NAME	CONTRACT MDQ OR MDQ	DATE ADJUST	ADJ TYPE	QUANTITY	DISC.	UNIT PRICE	AMOUNT DUE
----------	-------------	------------------------------	------------------	---------------------	-------------	----------	----------	-------	------------	------------

RELEASED CAPACITY

- NO RELEASED CAPACITY -

0.00

CONTRACT LEVEL CHARGES

0001	REB			29301			29301		0.16040	4,639.88
0002	RES			29301			29301	*	3.33030	97,581.12

Fixed

CHARGES BASED ON VOLUMES TRANSPORTED

0003	CMB			879030			508895		0.00040	203.56
0004	CMD			879030			508895		0.01240	6,310.30

508,895 \times 0.0128 = 6,513.86

(A)

Volume

MISC. SURCHARGES

- NO MISC. SURCHARGES -

0.00

INVOICE AMOUNT FOR TA0907 - FTS - PRODUCTION

Note: Additional (A) Charges
in Market Zone.

108,794.86

TRANSPORTER: EMPIRE DIST ELC 01511
TA0907 - PTS - PRODUCTION AREA - RECEIPT

WILLIAMS GAS PIPELINES CENTRAL, INC.
ALLOCATED VOLUMES STATEMENT
FOR THE MONTH OF: JUNE 2002

PAGE 5
07/11/2002 11:04:25
ALL VOLUMES ARE DERATHERMS
FUEL-IN-KIND PERCENT = 1.64

ADJ DATE/ TYPE	LOC #	LOCATION NAME	SELLER #	SELLER NAME	OTHER SHIPPER CON#	PKG ID #	PKG RANK	ALLOC METHOD TYPE\OPR	GRS NOMS	ALLOCATED	FUEL	QUANTITY TRANSPORT
----------------------	----------	------------------	-------------	----------------	--------------------------	----------------	-------------	-----------------------------	-------------	-----------	------	-----------------------

CURRENT MONTH RECEIPT VOLUMES:

999050	PRD POOL	05338	WILLIAMS ENERGY	1KH0026			NOM	160,008	160,008	2,624	157,384
999050	PRD POOL	09886	E PRIME INC	1KH8446			NOM	195,475	195,475	3,206	192,269
999050	PRD POOL	09886	E PRIME INC	1SE8446			NOM	161,882	161,882	2,655	159,227

CURRENT MONTH RECEIPT VOLUMES: TOTAL

PRIOR PERIOD RECEIPT ADJUSTMENTS:

* - NO RECEIPT ADJUSTMENTS -*

PRIOR PERIOD RECEIPT ADJUSTMENTS: TOTAL

TOTAL RECEIPTS:

517,365	517,365	8,485	508,850
0	0	0	0
0	0	0	0
517,365	517,365	8,485	508,850

Note: Additional (B) charges in market zone

210 DRS 0310

WILLIAMS

JUL-11-2002 14:00

TRANSPORTER: EMPIRE DIST ELC 01511
TA0907 - FTS - PRODUCTION AREA - DELIVERY

WILLIAMS GAS PIPELINES CENTRAL, INC.
ALLOCATED VOLUMES STATEMENT
FOR THE MONTH OF: JUNE 2002

PAGE 6
07/11/2002 11:04:25
ALL VOLUMES ARE DEKATHERMS

ADJ DATE/ TYPE	LOC #	LOCATION NAME	CSM #	CONSUMER NAME	OTHER SHIPPER CON#	PKG ID #	PKG RNK	ALLOC METHOD TYPE\OPR RNK	GRS NOMS
----------------------	----------	------------------	----------	------------------	--------------------------	----------------	------------	---------------------------------	-------------

CURRENT MONTH DELIVERY VOLUMES:

999000	PRD/MKT INTERFA	01511	EMPIRE DIST ELC	1TA0907			NOM		457,895
999000	PRD/MKT INTERFA	08629	TEWASKA MKT INC	1RAS838			NOM		51,000

CURRENT MONTH DELIVERY VOLUMES: TOTAL

D
I A G
QUANTITY S C R
TRANSPORT C A I

457,895

51,000

508,895

PRIOR PERIOD DELIVERY ADJUSTMENTS

0

0

* - NO DELIVERY ADJUSTMENTS - *

PRIOR PERIOD DELIVERY ADJUSTMENTS TOTAL

0

TOTAL DELIVERIES:

508,895

CURRENT MONTH BALANCE FOR TA0907 - FTS - PRODUCTION AREA

15

BEGINNING BALANCE: (+) DUE WILLIAMS (-) DUE SHIPPER

0

NETTING TRANSFER TO 01511 15-

(15)

INJECTION OR WITHDRAWAL FROM STORAGE: (-) WITHDRAWAL (+) INJECTION

0

CASKOUT

0

BALANCING FEE FUEL

0

NET MONTH END BALANCE: (+) DUE WILLIAMS (-) DUE SHIPPER

0

WILLIAMS

JUL-11-2002 14:00

TRANSPORTER: EMPIRE DIST ELC
TA0907 - FTS - MARKET

01511

WILLIAMS GAS PIPELINES CENTRAL, INC.
CHARGE SUMMARY STATEMENT
FOR THE MONTH OF: JUNE 2002

PAGE 7
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LINE NO.	CHARGE TYPE	CONTRACT NUMBER DELIVERY LOC	RA CONTRACT NAME	CONTRACT MDTQ OR MDQ	DATE ADJUST	ADJ TYPE	QUANTITY	DISC.	UNIT PRICE	AMOUNT DUE
----------	-------------	------------------------------	------------------	----------------------	-------------	----------	----------	-------	------------	------------

RELEASED CAPACITY

* - NO RELEASED CAPACITY - *

CONTRACT LEVEL CHARGES

0005	GRH						28800	*	0.00000	0.00
0006	REB			28800			28800		0.16040	4,619.52
0007	RES			28800			28800	*	1.61530	46,520.64

CHARGES BASED ON VOLUMES TRANSPORTED

0008	CMB			864000			587049	(A)	0.00040	234.82
0009	CMD			864000			587049		0.00610	3,581.00

MISC. SURCHARGES

0010	ACA						587049		0.00210	1,232.81
0011	GRI						587049	*	0.00000	0.00

INVOICE AMOUNT FOR TA0907 -FTS- MARKET

587049 * 0.0086 = 5,048.63 56,188.79

INVOICE AMOUNT FOR TA0907 -FTS-

164,983.65

P.03/19

270 683 8978

WILLIAMS

JUL-11-2002 14:00

TRANSPORTER: EMPIRE DIST ELC 01511
 TA0907 - FTS - MARKET AREA - RECEIPT

WILLIAMS GAS PIPELINES CENTRAL, INC.
 ALLOCATED VOLUMES STATEMENT
 FOR THE MONTH OF: JUNE 2002

PAGE 8
 07/11/2002 11:04:25
 ALL VOLUMES ARE DEKATHERMS
 FUEL-IN-KIND PERCENT = .690

ADJ DATE/ TYPE	LOC #	LOCATION NAME	SELLER #	SELLER NAME	OTHER SHIPPER CON#	PKG ID #	ALLOC PKG RNK	METHOD TYPE\OPR	GRS NOMS	ALLOCATED	FUEL	QUANTITY TRANSPORT
----------------------	----------	------------------	-------------	----------------	--------------------------	----------------	---------------------	--------------------	-------------	-----------	------	-----------------------

CURRENT MONTH RECEIPT VOLUMES:

999000	PRD/MKT	INTERPA	01511	EMPIRE DIST ELC	TA0907		NOM		457,895	457,895	3,159	454,736
--------	---------	---------	-------	-----------------	--------	--	-----	--	---------	---------	-------	---------

CURRENT MONTH RECEIPT VOLUMES: TOTAL

$$\begin{array}{r}
 3159 = 0.69\% \\
 \hline
 457895
 \end{array}$$

457,895	457,895	3,159	454,736
---------	---------	-------	---------

PRIOR PERIOD RECEIPT ADJUSTMENTS:

* - NO RECEIPT ADJUSTMENTS - *

PRIOR PERIOD RECEIPT ADJUSTMENTS: TOTAL

TOTAL RECEIPTS:

457,895	3,159	454,736
---------	-------	---------

TRANSPORTER: EMPIRE DIST ELC 01511
TA0907 - FTS - MARKET AREA - DELIVERY

WILLIAMS GAS PIPELINES CENTRAL, INC.
ALLOCATED VOLUMES STATEMENT
FOR THE MONTH OF: JUNE 2002

PAGE 9
07/11/2002 11:04:25
ALL VOLUMES ARE DEKATHERMS

ADJ DATE/ TYPE	LOC #	LOCATION NAME	CSM #	CONSUMER NAME	OTHER SHIPPER CON#	PKG ID #	ALLOC METHOD RNK TYPE\OPR RNK	GRS NOMS
----------------------	----------	------------------	----------	------------------	--------------------------	----------------	-------------------------------------	-------------

D
I A G
QUANTITY S C R
TRANSPORT C A I

CURRENT MONTH DELIVERY VOLUMES:

378501	EMPIRE DISTRICT	01511	EMPIRE DIST ELC		DF1	240	29,096	***
378502	EMPIRE LARUSSEL	01511	EMPIRE DIST ELC		DF1	240	37,612	***
378503	EMPIRE STATELIN	01511	EMPIRE DIST ELC		DF1	240	79,267	***
378504	STATE LINE UNIT	01511	EMPIRE DIST ELC		DF1	454,022	441,074	***

CURRENT MONTH DELIVERY VOLUMES: TOTAL

587,049
=====

PRIOR PERIOD DELIVERY ADJUSTMENTS

0

0 ***

* - NO DELIVERY ADJUSTMENTS - *

PRIOR PERIOD DELIVERY ADJUSTMENTS TOTAL

0
=====

TOTAL DELIVERIES:

587,049
=====

CURRENT MONTH BALANCE FOR TA0907 - FTS - MARKET AREA

132,313
=====

BEGINNING BALANCE: (+) DUE WILLIAMS (-) DUE SHIPPER

0

NETTING TRANSFER TO 01511 132313-

(132,313)

INJECTION OR WITHDRAWAL FROM STORAGE: (-) WITHDRAWAL (+) INJECTION

0
=====

CASHOUT

0

BALANCING FEE FUEL

0

NET MONTH END BALANCE: (+) DUE WILLIAMS (-) DUE SHIPPER

0
=====

2
3
WILLIAMS

14.01

JUL-11-2002

TRANSPORTER: EMPIRE DIST ELC
TA8251 - FTS - PRODUCTION

01511

WILLIAMS GAS PIPELINES CENTRAL, INC.
CHARGE SUMMARY STATEMENT
FOR THE MONTH OF: JUNE 2002

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LINE NO.	CHARGE TYPE	CONTRACT NUMBER DELIVERY LOC	RA CONTRACT NAME	CONTRACT MDQ OR MDQ	DATE ADJUST	ADJ TYPE	QUANTITY	DISC.	UNIT PRICE	AMOUNT DUE
----------	-------------	------------------------------	------------------	---------------------	-------------	----------	----------	-------	------------	------------

RELEASED CAPACITY

- NO RELEASED CAPACITY -

0.00

CONTRACT LEVEL CHARGES

0012	PER			55646			55646		0.16040	8,925.62
0013	RES			55646			55646	*	3.36810	187,421.29

CHARGES BASED ON VOLUMES TRANSPORTED

0014	CMB			1669380			410655		0.00040	164.26
0015	CPD			1669380			410655		0.01240	5,092.12

MISC. SURCHARGES

- NO MISC. SURCHARGES -

0.00

INVOICE AMOUNT FOR TA8251 - FTS - PRODUCTION

201,601.29

WILLIAMS

JUL-11-2002 14:01

TRANSPORTER: EMPIRE DIST ELC 01511
TAS251 - PTS - PRODUCTION AREA - RECEIPT

WILLIAMS GAS PIPELINES CENTRAL, INC.
ALLOCATED VOLUMES STATEMENT
FOR THE MONTH OF: JUNE 2002

PAGE 11
07/11/2002 11:04:25
ALL VOLUMES ARE DEKATHERMS
FUEL-IN-KIND PERCENT = 1.64

ADJ DATE/ TYPE	LOC #	LOCATION NAME	SELLER #	SELLER NAME	OTHER SHIPPER CON#	PKG ID #	PKG RNK	ALLOC METHOD TYPE\OPR RNK	GRS NOMS	ALLOCATED	FUEL	QUANTITY TRANSPORT
----------------------	----------	------------------	-------------	----------------	--------------------------	----------------	------------	---------------------------------	-------------	-----------	------	-----------------------

CURRENT MONTH RECEIPT VOLUMES:

	999050	PRD POOL	02626	KANSAS GAS	1CB0003			NOM	67,500	67,500	1,107	66,393
	999050	PRD POOL	05219	ONEOK ENERGY M	1CB0001			NOM	10,000	10,000	164	9,836
	999050	PRD POOL	05338	WILLIAMS ENERGY	1CB0026			NOM	55,000	55,000	902	54,098
	999050	PRD POOL	07437	ANADARKO ENERGY	1CB0004			NOM	185,000	185,000	3,034	181,966
	999660	PRD STORAGE TRA	05338	WILLIAMS ENERGY	1SAB075			NOM	10,000	10,000	164	9,836
	999060	PRD STORAGE TRA	09611	TEKASKA GAS	1SAB070			NOM	90,000	90,000	1,476	88,524

CURRENT MONTH RECEIPT VOLUMES: TOTAL

417,500	417,500	6,847	410,653
---------	---------	-------	---------

PRIOR PERIOD RECEIPT ADJUSTMENTS:

0	0	0	0
---	---	---	---

* - NO RECEIPT ADJUSTMENTS - *

PRIOR PERIOD RECEIPT ADJUSTMENTS: TOTAL

0	0	0	0
---	---	---	---

TOTAL RECEIPTS:

417,500	417,500	6,847	410,653
---------	---------	-------	---------

WILLIAMS

JUL 14 2002 14:00

TRANSPORTER: EMPIRE DIST ELC 01511
TA8251 - PTS - PRODUCTION AREA - DELIVERY

WILLIAMS GAS PIPELINES CENTRAL, INC.
ALLOCATED VOLUMES STATEMENT
FOR THE MONTH OF: JUNE 2002

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ALL VOLUMES ARE DEKATHERMS

ADJ	LOC	LOCATION	CSM	CONSUMER	OTHER	PKG	ALLOC	GRS
DATE/	#	NAME	#	NAME	SHIPPER	ID	METHOD	NOMS
TYPE					CON#	#	RMK TYPE\OPR RMK	

D	I	A	G
QUANTITY	S	C	R
TRANSPORT	C	A	I

CURRENT MONTH DELIVERY VOLUMES:

999000	PRD/MKT	INTERFA	01511	EMPIRE DIST ELC	1TA8251	NOM	410,655
--------	---------	---------	-------	-----------------	---------	-----	---------

410,655

CURRENT MONTH DELIVERY VOLUMES: TOTAL

410,655

PRIOR PERIOD DELIVERY ADJUSTMENTS

0

0

* - NO DELIVERY ADJUSTMENTS - *

PRIOR PERIOD DELIVERY ADJUSTMENTS TOTAL

0

TOTAL DELIVERIES:

410,655

CURRENT MONTH BALANCE FOR TA8251 - PTS - PRODUCTION AREA

2

BEGINNING BALANCE: (+) DUE WILLIAMS () DUE SHIPPER

0

NETTING TRANSFER TO 01511 2-

(2)

INJECTION OR WITHDRAWAL FROM STORAGE: (-) WITHDRAWAL (+) INJECTION

0

CASHOUT

0

BALANCING FEE FUEL

0

NET MONTH END BALANCE: (+) DUE WILLIAMS (-) DUE SHIPPER

0

WILLIAMS

JUL-11-2002 14:02

TRANSPORTER: EMPIRE DIST BLC
TA8251 - FTS - MARKET

01511

WILLIAMS GAS PIPELINES CENTRAL, INC.
CHARGE SUMMARY STATEMENT
FOR THE MONTH OF: JUNE 2002

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LINE NO.	CHARGE TYPE	CONTRACT NUMBER DELIVERY LOC	RA CONTRACT NAME	CONTRACT MDTQ OR MDQ	DATE ADJUST	ADJ TYPE	QUANTITY	DISC.	UNIT PRICE	AMOUNT DUE
-------------	----------------	------------------------------------	------------------------	----------------------------	----------------	-------------	----------	-------	---------------	---------------

RELEASED CAPACITY

NO RELEASED CAPACITY --

0.00

CONTRACT LEVEL CHARGES

0016	GRH			55000			55000	*	0.00000	0.00
0017	RES			55000			55000		0.16040	8,822.00
0018	RES			55000			55000	*	1.62460	89,353.00

CHARGES BASED ON VOLUMES TRANSPORTED

0019	CMB			1650000			396190		0.00040	158.48
0020	CMD			1650000			396190		0.00610	2,416.76

MISC. SURCHARGES

0021	ACA						396190		0.00210	832.00
0022	GRI						396190	*	0.00000	0.00

INVOICE AMOUNT FOR TA8251 - FTS- MARKET

101,582.24

INVOICE AMOUNT FOR TA8251 - FTS-

302,185.53

TRANSPORTER: EMPIRE DIST ELC 01511
TA8251 - FTS - MARKET AREA - RECEIPT

WILLIAMS GAS PIPELINES CENTRAL, INC.
ALLOCATED VOLUMES STATEMENT
FOR THE MONTH OF: JUNE 2002

PAGE 14
07/11/2002 11:04:25
ALL VOLUMES ARE DEKATHERMS
FUEL-IN-KIND PERCENT = .690

ADJ DATE/ TYPE	LOC #	LOCATION NAME	SELLER #	SELLER NAME	OTHER SHIPPER CON#	PKG ID #	ALLOC METHOD RANK TYPE\OPR RANK	GRS NOMS	ALLOCATED	FUEL	QUANTITY TRANSPORT
----------------------	----------	------------------	-------------	----------------	--------------------------	----------------	---------------------------------------	-------------	-----------	------	-----------------------

CURRENT MONTH RECEIPT VOLUMES:

999000	PRD/NKT	INTERFA	01511	EMPIRE DIST ELC	TA8251		NOM	410,655	410,655	2,834	407,821
--------	---------	---------	-------	-----------------	--------	--	-----	---------	---------	-------	---------

CURRENT MONTH RECEIPT VOLUMES: TOTAL

410,655	410,655	2,834	407,821
---------	---------	-------	---------

PRIOR PERIOD RECEIPT ADJUSTMENTS:

* - NO RECEIPT ADJUSTMENTS - *

0	0	0	0
---	---	---	---

PRIOR PERIOD RECEIPT ADJUSTMENTS: TOTAL

0	0	0	0
---	---	---	---

TOTAL RECEIPTS:

410,655	2,834	407,821
---------	-------	---------

TRANSPORTER: EMPIRE DIST ELC 01511
TAS251 - PTS - MARKET AREA - DELIVERY

WILLIAMS GAS PIPELINES CENTRAL, INC.
ALLOCATED VOLUMES STATEMENT
FOR THE MONTH OF: JUNE 2002

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ALL VOLUMES ARE DEKATHERMS

ADJ	LOC	LOCATION	CSH	CONSUMER	OTHER	PKG	ALLOC	GRS
DATE/	#	NAME	#	NAME	SHIPPER	ID	METHOD	NOMS
TYPE					CON#	#	RNK TYPE\OPR RNK	

D	I	A	G
QUANTITY	S	C	R
TRANSPORT	C	A	I

CURRENT MONTH DELIVERY VOLUMES:

378504 STATE LINE UNIT 01511 EMPIRE DIST ELC

DF1

407,820

396,190 * * *

CURRENT MONTH DELIVERY VOLUMES: TOTAL

396,190

PRIOR PERIOD DELIVERY ADJUSTMENTS

0

0 * * *

* - NO DELIVERY ADJUSTMENTS - *

PRIOR PERIOD DELIVERY ADJUSTMENTS TOTAL

0

TOTAL DELIVERIES:

396,190

CURRENT MONTH BALANCE FOR TAS251 - PTS - MARKET AREA

{11,631}

BEGINNING BALANCE: (+) DUE WILLIAMS (-) DUE SHIPPER

0

NETTING TRANSFER TO 01511 11631

11,631

INJECTION OR WITHDRAWAL FROM STORAGE: (-) WITHDRAWAL (+) INJECTION

0

CASHOUT

0

BALANCING FEE FUEL

0

NET MONTH END BALANCE: (+) DUE WILLIAMS (-) DUE SHIPPER

0

WILLIAMS

JUL-11-2002 14:03

TRANSPORTER: EMPIRE DIST ELC 01511

WILLIAMS GAS PIPELINES CENTRAL, INC.
 IMBALANCE STATEMENT
 FOR THE MONTH OF: JUNE 2002

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P - PRODUCTION AREA
 M - MARKET AREA

(-) : BALANCE DUE SHIPPER
 (+) : BALANCE DUE WILLIAMS

CON#	R DTR E ACC A	BEG BAL (AS IS)	GRS RCP (-)	FUE (+)	GRS DLV (+)	CON#	STO INJ (+)	STO WDR (-)	BAL TRSF/NET (+)	PRELIM BAL (-)	CASH OUT (+)	BAL FUE (+)	END BAL (-)	OUT OF TOL
IMBAL	P 06/02	3,593	0	0	0		0	0	17	3,610	0	0	3,610	
TA0907	P 06/02	0	517,365	8,485	508,895		0	0	(15)	0	0	0	0	
TA8251	P 06/02	0	417,500	6,847	410,655		0	0	(2)	0	0	0	0	
AREA P		3,593	934,865	15,332	919,550		0	0	0	3,610	0	0	3,610	
TOLERANCE VOL -														0
IMBAL	P 05/02	3,599	0	0	0		0	0	(6)	3,593	0	0	3,593	
TA0907	P 05/02	0	499,464	8,191	491,267		0	0	6	0	0	0	0	
TA8251	P 05/02	0	410,000	6,724	403,276		0	0	0	0	0	0	0	
AREA P		3,599	909,464	14,915	894,543		0	0	0	3,593	0	0	3,593	
TOLERANCE VOL -														0
IMBAL	P 04/02	3,541	0	0	0		0	0	58	3,599	0	0	3,599	
TA0907	P 04/02	0	450,560	7,390	443,167		0	0	3	0	0	0	0	
TA8251	P 04/02	0	577,297	9,468	567,890		0	0	(61)	0	0	0	0	
AREA P		3,541	1,027,857	16,858	1,011,057		0	0	0	3,599	0	0	3,599	
TOLERANCE VOL -														0
IMBAL	M 06/02	(35,380)	0	0	0		0	0	120,682	85,302	0	0	85,302	
TA0907	M 06/02	0	457,895	3,159	587,049		0	0	(112,313)	0	0	0	0	
TA8251	M 06/02	0	410,655	2,834	396,190		0	0	11,631	0	0	0	0	
AREA M		(35,380)	868,550	5,993	983,239		0	0	0	85,302	0	0	85,302	
TOLERANCE VOL -														0
IMBAL	M 05/02	26,638	0	0	0		0	0	(62,018)	(35,380)	0	0	(35,380)	

WILLIAMS

JUL-11 2002 14:00

WILLIAMS GAS PIPELINES CENTRAL, INC.
IMBALANCE STATEMENT
FOR THE MONTH OF: JUNE 2002

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11:04:2

270.19

(-) : BALANCE DUE SHIPPER
(+) : BALANCE DUE WILLIAMS

CON#	A R DTE B ACC A	BEG BAL (AS IS)	GRS RCP (-)	FOR (+)	GRS DLV (+)	CON#	STO INJ (+)	STO WDR (-)	BAL TRSE/NET (+)	PRELIM BAL (=)	CASH OUT (+)	BAL FUE (+)	END BAL (=)	OUT OF TOL
TA0907	M 05/02	0	491,267	3,390	475,995		0	0	11,882	0	0	0	0	
TA8251	M 05/02	0	403,276	2,783	350,357		0	0	50,136	0	0	0	0	
AREA M		26,638	894,543	6,173	826,352		0	0	0	(35,380)	0	0	(35,380)	
						TOLERANCE VOL =		82,635						
IMBAL	M 04/02	566	0	0	0		0	0	26,072	26,638	0	0	26,638	
TA0907	M 04/02	0	443,167	3,058	470,648		0	0	(30,579)	0	0	0	0	
TA8251	M 04/02	0	567,090	3,918	559,465		0	0	4,507	0	0	0	0	
AREA M		566	1,011,057	6,976	1,030,153		0	0	0	26,638	0	0	26,638	
						TOLERANCE VOL =		103,015						

**GAS PIPELINES - Central**

ONE OF THE WILLIAMS COMPANIES, INC.

P. O. BOX 20008 3400 PRÉDERICA STREET
OWENSBORO, KENTUCKY 42304-0008
TEL. (270) 926-8686

**GAS REVENUE ACCOUNTING
FAX MESSAGE**DATE: 07/11/2002 # PAGES INCLUDING COVER SHEET: _____TO: Doug Gallimore COMPANY: EMPIREFAX #: (417) 625-5142 PHONE #: _____FROM: Dennis Wathen PHONE #: (270) 688-6443COMMENTS: Customer 1511 Monthly Invoice

FAX NUMBER FOR GAS REVENUE ACCOUNTING :

*** (270) 683-8978 ***

If there is a problem with this transmission, call (270) 688-6783, or
call the sender.

SEPTEMBER 2002

Schedule BPB-7

RATES EFFECTIVE AS OF SEPTEMBER 1, 2002

Williams Gas Pipelines Central, Inc
FERC Gas Tariff
Original Volume No. 1

Twelfth Revised Sheet No. 6
Superseding
Eleventh Revised Sheet No. 6

STATEMENT OF RATES FOR TRANSPORTATION OF NATURAL GAS
AND OTHER RELATED SERVICES

		Minimum Rate 1/	Maximum Rate 1/
TSSP	No Notice Fee	\$.0000	\$.0154
	Reservation - FSS - Deliverability	.0000	.5001
	Reservation - FSS - Capacity 4/	.0000	.0285
	Reservation - FTS-P	.0000	5.6118
	Injection - FSS	.0122	.0122
	Withdrawal - FSS	.0122	.0122
	Commodity - FTSP	.0124	.0124
	Authorized Overrun - FSS 2/	.0000	.0570
	Authorized Overrun - FTSP	.0124	.1969
TSSM	NoNotice Fee	.0000	.0154
	Reservation - FSS - Deliverability	.0000	.5001
	Reservation - FSS - Capacity 4/	.0000	.0285
	Reservation - FTS-P 3/	.0000	5.6118
	Reservation - FTS-M	.0000	2.8014
	Injection - FSS	.0122	.0122
	Withdrawal - FSS	.0122	.0122
	Commodity - FTSP 3/	.0124	.0124
	Commodity - FTSM	.0061	.0061
	Authorized Overrun - FSS 2/	.0000	.0570
	Authorized Overrun - FTSP 3/	.0124	.1969
	Authorized Overrun - FTSM	.0061	.0982
STSP	Commodity	.0124	.7502
	Authorized Overrun	.0124	.7502
STSM	Commodity - STSP 3/	.0124	.3006
	Authorized Overrun - STSP 3/	.0124	.3006
	Commodity - STSM	.0061	.4838
	Authorized Overrun - STSM	.0061	.4838
FTSP	Reservation	.0000	5.6118
	Reservation Balancing Fee	.0000	.1604
	Commodity	.0124	.0124
	Commodity Balancing Fee	.0004	.0004
	Authorized Overrun	.0124	.1969
	Commodity Bal Fee - Auth Overrun	.0004	.0057
FTSM	Reservation	.0000	2.8014
	Reservation Balancing Fee	.0000	.1604
	Commodity	.0061	.0061
	Commodity Balancing Fee	.0004	.0004
	Authorized Overrun	.0061	.0982
	Commodity Bal Fee - Auth Overrun	.0004	.0057
SFTP	Commodity	.0124	.6526
	Commodity Balancing Fee	.0004	.0187
	Authorized Overrun	.0124	.6526
SFTM	Commodity - SFTP 3/	.0124	.3006
	Commodity Bal Fee - SFTP 3/	.0004	.0086
	Authorized Overrun - SFTP 3/	.0124	.3006
	Commodity - SFTM	.0061	.4230
	Commodity Bal Fee - SFTM	.0004	.0243
	Authorized Overrun - SFTM	.0061	.4230

See
Page 3 of 3

SEPTEMBER 2002

Page 2 of 3

For Additional Surcharges Applicable to all Rate Schedules, see Sheet No. 6A.
 Fuel Reimbursement Percentages applicable to all Rate Schedules are shown on
 Sheet No. 6B.

- 1/ Reservation rates are per Dth of MDTQ per month. Commodity Rates are per Dth.
- 2/ Applicable to Injections/Withdrawals in excess of MDIQ or MDWQ.
- 3/ FTSP, STSP, & SFTP are only applicable if firm capacity is reserved in the Production Area.
- 4/ Applied to monthend storage balance.

 Issued by: H. Dean Jones II, Vice President, Rates

Issued on: October 10, 2001

Effective on: November 1, 2001

 Williams Gas Pipelines Central, Inc
 FERC Gas Tariff
 Original Volume No. 1

Twentieth Revised Sheet No. 6A
 Superseding
 Nineteenth Revised Sheet No. 6A

 STATEMENT OF RATES FOR TRANSPORTATION OF NATURAL GAS
 AND OTHER RELATED SERVICES (CONTINUED)

		Minimum Rate 1/ -----	Maximum Rate 1/ -----
ITS-P	Winter Commodity	\$.0124	\$.1969
	Summer Commodity	.0124	.1600
	Commodity Balancing Fee	.0004	.0057
ITS-M	Winter Commodity	.0061	.0982
	Summer Commodity	.0061	.0798
	Commodity Balancing Fee	.0004	.0057
FSS	Deliverability Reservation	.0000	.5001
	Capacity Reservation 4/	.0000	.0285
	Injection	.0122	.0122
	Withdrawal	.0122	.0122
	Authorized Overrun	.0000	.0570
ISS	Commodity 4/	.0000	.0570
	Injection	.0122	.0122
	Withdrawal	.0122	.0122
PLS-P	Daily Commodity	.0000	.1600
PLS-M	Daily Commodity	.0000	.0798

 Additional Surcharges Applicable to all Rate Schedules:

Article 25 - GRI Funding Unit 2/	- Demand - Load Factors > 50%	\$.0660
	- Demand - Load Factors 50% or Less	.0407
	- Commodity - Small Customers	.0088
	- Commodity - Others	.0055
Article 26 - FERC Annual Charge Adjustment		.0021

 VOLUMETRIC FIRM CAPACITY RELEASE MAXIMUM RATES 5/
 STATED AT 100% LOAD FACTOR

	Maximum Rate -----
TSS-P No-Notice Fee	\$.0005
Reservation - FSS 4/	.0570

SEPTEMBER 2002

Page 3 of 3

	Reservation - FTS-P	.1845
TSS-M	No-Notice Fee	.0005
	Reservation - FSS 4/	.0570
	Reservation - FTS-P	.1845
	Reservation - FTS-M	.0921
FTS-P	Reservation	.1845
	Reservation Balancing Fee	.0053
FTS-M	Reservation	.0921
	Reservation Balancing Fee	.0053
FSS	Reservation 4/	.0570

Fuel Reimbursement Percentages applicable to all Rate Schedules are shown on Sheet No. 6B.

- 1/ Reservation rates are per Dth of MDTQ per month. Commodity Rates are per Dth.
- 2/ Applicable to nondiscounted transportation services.
- 3/ Exclusive of any surcharges and commodity charges.
- 4/ Applied to month-end storage balance.
- 5/ Does not apply to capacity release transactions of less than one year for the period March 27, 2000 until September 30, 2002.

Issued by: H. Dean Jones II, Vice President, Rates

Issued on: November 29, 2001

Effective on: January 1, 2002

Williams Gas Pipelines Central, Inc
FERC Gas Tariff
Original Volume No. 1

Fourth Revised Sheet No. 6B
Superseding
Third Revised Sheet No. 6B

FUEL REIMBURSEMENT PERCENTAGES FOR ALL RATE SCHEDULES

	Minimum Percent	Maximum Percent
Storage Injection	.81%	.81%
Production Area	.51%	1.64%
Market Area	.51%	.69%

2.37%

- 1/ Applicable as provided in Article 13.3 of the General Terms and Conditions.

Issued by: H. Dean Jones II, Vice President, Rates

Issued on: November 30, 2001

Effective on: January 1, 2002

WILLIAMS GAS PIPELINES CENTRAL, INC.
POST OFFICE BOX 20008
OWENSBORO, KENTUCKY 42304-0008
July-02

FAX: 417/625-6155

1511

221674

EMPIRE DISTRICT ELECTRIC
P.O. BOX 127
JOPLIN, MO 64502-0127
ATTN: RICHARD MCCORD

INVOICE NO: GSRDB-0702- 1511

INVOICE DATE: August 1, 2002

DUE DATE: August 15, 2002

Direct BHI for Recovery of Gas Supply Realignment costs pursuant to Stipulation and Agreement dated June 18, 1999 in Docket No. RP99-257 et al.

GSR BALANCE FORWARD	\$135,201.70
INTEREST @ 4.75% 7/1/2002 - 7/31/2002	\$614.94
TOTAL GSR DIRECT BILL @ 8/1/2002	<u>\$135,816.64</u>
MINIMUM PAYMENT DUE	
PRINCIPAL	\$22,533.81
INTEREST	\$614.94
PAST DUE PRINCIPAL	\$0.00
PAST DUE INTEREST	\$0.00
MINIMUM AMOUNT DUE	<u>\$23,148.55</u>

PLEASE RETURN A COPY OF THIS INVOICE AND SUPPORTING DOCUMENTATION WITH
PAYMENT WHEN PAYMENTS DIFFER FROM INVOICED AMOUNT
FOR QUESTIONS CONCERNING THIS INVOICE OR STATEMENT PLEASE CONTACT RUTH CLARK (270)688-6790.

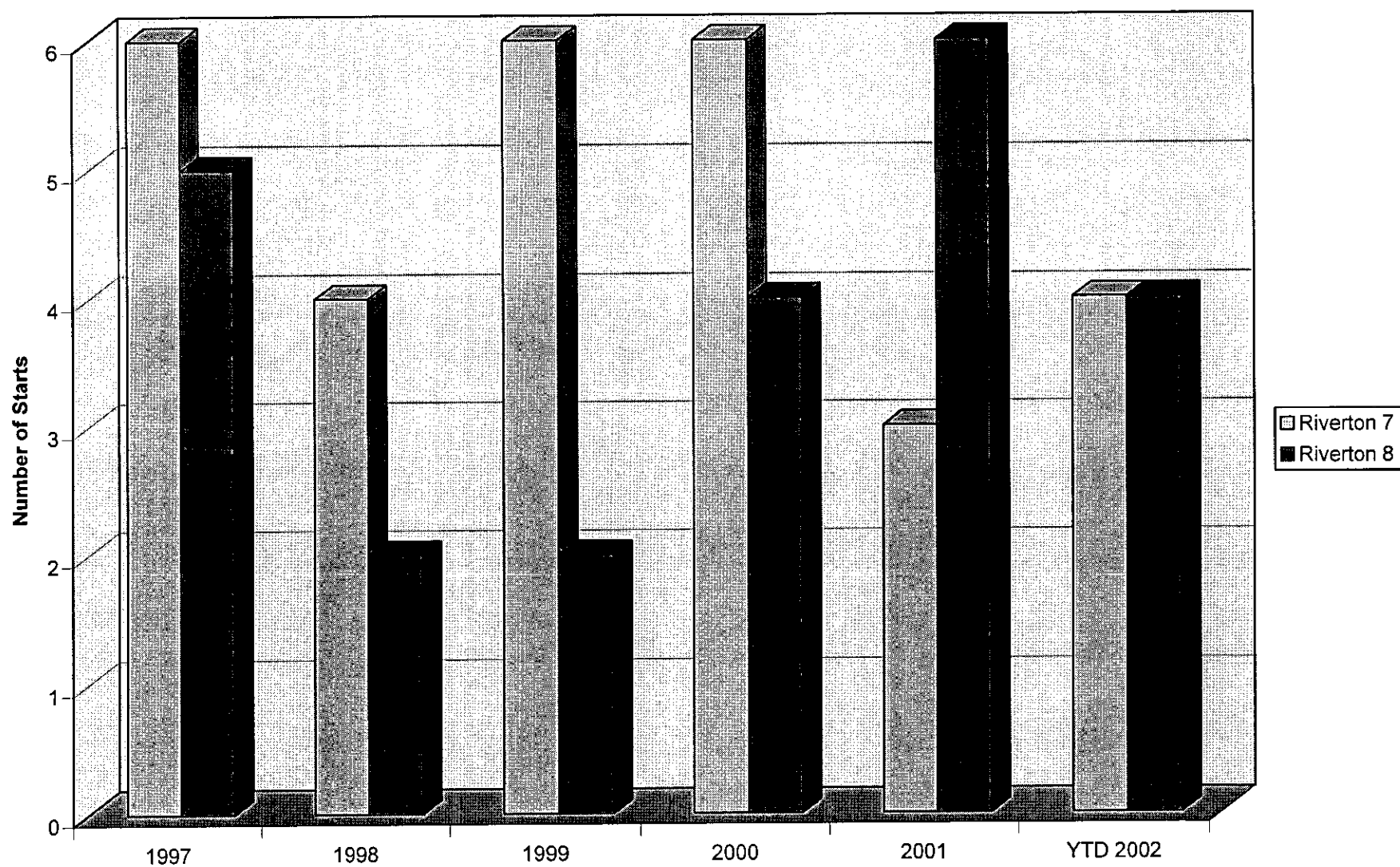
CHECK REMITTANCE ADDRESS:

WILLIAMS GAS PIPELINES CENTRAL, INC
P.O. BOX 94174
TULSA, OK 74194

ELECTRONIC FUND TRANSFER ADDRESS:

CITIBANK, N.A. NEW YORK, NY
ABA NUMBER: 0-210-0008-9
ACCOUNT NUMBER: 4055-5372
INVOICE NO: GSRDB-0702- 1511

Historical Starts on Riverton Coal Units



**Summary of TLR Events
Involving Deliveries to EDE**

7/1/2001	
7/15/2001	
7/29/2001	
8/12/2001	
8/26/2001	
9/9/2001	
9/23/2001	
10/7/2001	
10/21/2001	
11/4/2001	
11/18/2001	
12/2/2001	
12/16/2001	
12/30/2001	
1/13/2002	
1/27/2002	
2/10/2002	
2/24/2002	
3/10/2002	
3/24/2002	
4/7/2002	
4/21/2002	
5/5/2002	
5/19/2002	
6/2/2002	
6/16/2002	
6/30/2002	

NERC TRANSMISSION LOADING RELIEF (TLR) PROCEDURE LOG

CONTROL AREA: MHEB

DATE: 06/30/02

ISSUING SECURITY COORDINATOR: **MISO**

FLOW GATE ID: 6002

FLOW GATE DESCRIPTION:

MHEX_S

MONITORED ELEMENTS:

Rating

CONTINGENT ELEMENTS:

OTDF

DESCRIBE REASON FOR LOADING PROBLEM:

Flows at Scheduling Reliability Limit

TLR Levels

0: TLR Incident Canceled

1: Notify Security Coordinators of potential problems.

2a, 2b, 2c: Halt additional "contributing" transactions.

3. Curtail Non-firm transactions (state priorities being curtailed)

4. Reconfigure and redispach to continue firm transactions if needed.

5: Curtail Firm Transmission Service.

6. Implement emergency procedures.

Priorities

NS - Service over secondary receipt and delivery points

NH - Hourly Service

ND - Daily Service

NW - Weekly Service

NM - Monthly Service

NN: Non-firm imports for native load and network customers from non-designated network resources

Firm Service

TLR ACTIONS

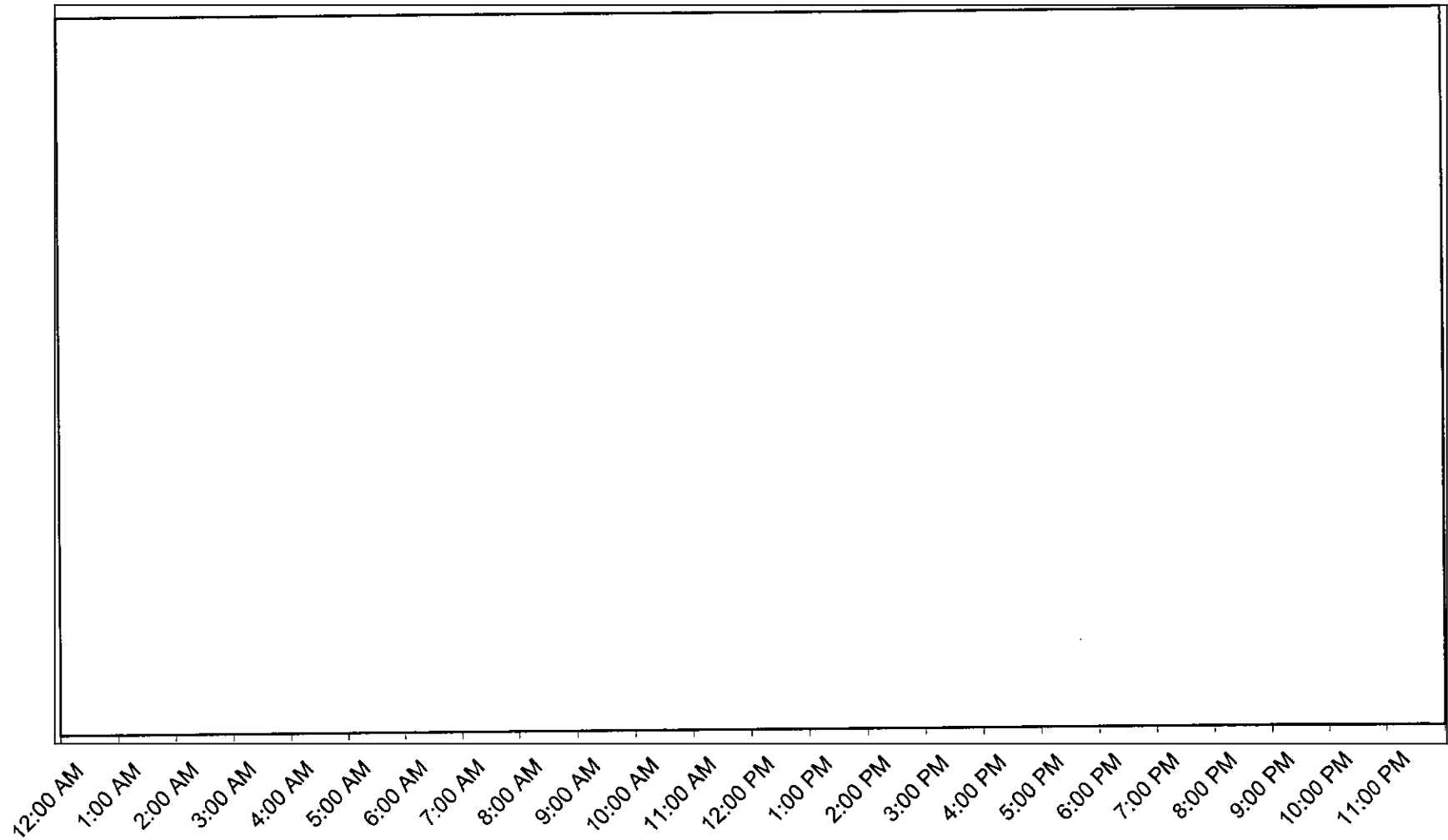
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DATE	VAL	WELL	PG	TD	UNIT	ROD	CONCRETE	DEPTH	SPLITTING	REMARKS	DIAGNOSIS	HOLE	PROBLEM	ANALYSIS
04-Jul-01	2001	7	3102	Blair-Francis	138V	none	none	1610	1610	3 hrs, 0 mins	3A	1	134	IMAPP/NSP AEO EES ERCE KOPL WR
04-Jul-01	2001	7	1353	Wilton-Livonia 138V	none	none	none	1655	2131	5 hrs, 5 mins	3A	1	NH-414	IMAPP/NSP AEO EES ERCE KOPL WR
06-Jul-01	2001	7	3102	Blair-Francis	138V	none	none	1017	1017	12 hrs, 53 mins	3A	7	721	IMAPP/NSP AEO EES ERCE KOPL WR
07-Jul-01	2001	7	3023	LeCroyne - West Garden	345 V	LeCroyne - West Garden 345 V	1027	1833	1330	11 hrs, 6 mins	3A	7	67	IMAPP/NSP AEO EES ERCE KOPL WR
08-Jul-01	2001	7	3256	Clair-Coles - Rock Creek	O.C. - Sub 91	1417	1042	1102	2104	10 hrs, 2 mins	3A	1	50	IMAPP/NSP AEO EES ERCE KOPL WR
10-Jul-01	2001	7	5023	LeCroyne - Stillwell 345 V	LeCroyne - West Garden 345 V	1007	1532	1007	1532	5 hrs, 25 mins	3A	1	50	IMAPP/NSP AEO EES ERCE KOPL WR
13-Jul-01	2001	7	3102	Blair-Francis	138V	none	none	0939	0939	17 hrs, 28 mins	3A	5	80	IMAPP/NSP AEO EES ERCE KOPL WR
13-Jul-01	2001	7	5023	Northwestern Station-Ontario 345 V	LeCroyne - West Garden 345V	0706	2226	1628	1642	15 hrs, 20 mins	3A	7	70	IMAPP/NSP AEO EES ERCE KOPL WR
16-Jul-01	2001	7	5023	LeCroyne - Stillwell 345V	LeCroyne - West Garden 345V	1628	2027	1628	2027	3 hrs, 59 mins	3A	2-NH	IMAPP/NSP AEO EES ERCE KOPL WR	
17-Jul-01	2001	7	6007	GENTLEMAN-RED WILLOW 345V	LeCroyne - West Garden 345V	0720	1728	0720	1728	10 hrs, 4 mins	3A	2	33	IMAPP/NSP AEO EES ERCE KOPL WR
22-Jul-01	2001	7	5042	NORTH PLATTE-STOCKVILLE 115KV FLO GENTLEMAN-RED WILLOW 345V	LeCroyne - West Garden 345V	0641	2125	0641	2125	14 hrs, 44 mins	3A	2	150	IMAPP/NSP AEO EES ERCE KOPL WR
23-Jul-01	2001	7	5042	Northwest Teutonia - Patterson 138V	LeCroyne - West Garden 345 V	0010	0625	0010	0625	8 hrs, 15 mins	3A	2-NH	IMAPP/NSP AEO EES ERCE KOPL WR	
24-Jul-01	2001	7	6008	COOPER-ST. JOSEPH & COOPER FAIRPORT	LeCroyne - West Garden 345 V	1101	2232	1101	2232	11 hrs, 31 mins	3A	2-NH	IMAPP/NSP AEO EES ERCE KOPL WR	
25-Jul-01	2001	7	1353	Tremont-Greenwood 115 V	LeCroyne - West Garden 345V	1211	2127	1211	2127	9 hrs, 16 mins	3A	6	31	IMAPP/NSP AEO EES ERCE KOPL WR
25-Jul-01	2001	7	5042	Northwest Teutonia-Patterson 138V	LeCroyne - West Garden 345V	1459	2128	1459	2128	6 hrs, 30 mins	3A	2	39	IMAPP/NSP AEO EES ERCE KOPL WR
30-Jul-01	2001	7	5037	Midwest-Claresville 345 V	LeCroyne - West Garden 345 V	1211	2128	1211	2128	9 hrs, 13 mins	3A	7	76	IMAPP/NSP AEO EES ERCE KOPL WR
30-Jul-01	2001	7	5037	Midwest-Claresville 345 V	LeCroyne - West Garden 345 V	0949	1707	0949	1707	7 hrs, 46 mins	3A	7	97	IMAPP/NSP AEO EES ERCE KOPL WR
31-Jul-01	2001	7	5037	Midwest-Claresville 345 V	LeCroyne - West Garden 345 V	0925	2059	0925	2059	11 hrs, 53 mins	3A	7	53	IMAPP/NSP AEO EES ERCE KOPL WR
31-Jul-01	2001	7	5023	LeCroyne - Stillwell 345 V	LeCroyne - West Garden 345 V	0907	1443	0907	1443	5 hrs, 26 mins	3A	7	53	IMAPP/NSP AEO EES ERCE KOPL WR
02-Aug-01	2001	6	5023	LACROYNE - STILLWELL 345 V	LACROYNE - WEST GARDNER 345 V	0917	2248	0917	2248	11 hrs, 50 mins	3A	7	NS-60	IMAPP/NSP AEO EES ERCE KOPL WR
02-Aug-01	2001	6	5023	LACROYNE - STILLWELL 345 V	LACROYNE - WEST GARDNER 345 V	1297	2059	1297	2059	11 hrs, 50 mins	3A	7	65	IMAPP/NSP AEO EES ERCE KOPL WR
05-Aug-01	2001	6	1353	Wilton-Livonia 138 V	LACROYNE - WEST GARDNER 345 V	0948	2107	0948	2107	13 hrs, 20 mins	3A	1, 2, 7	65	IMAPP/NSP AEO EES ERCE KOPL WR
06-Aug-01	2001	6	5023	Midwest-Claresville 345V	LeCroyne - West Garden 345V	0810	2240	0810	2240	13 hrs, 30 mins	3A	1	56	IMAPP/NSP AEO EES ERCE KOPL WR
07-Aug-01	2001	6	3706	Amol - Heddon 345 V	LeCroyne - West Garden 345 V	0830	2013	0830	2013	11 hrs, 43 mins	3A	1	214	IMAPP/NSP AEO EES ERCE KOPL WR
07-Aug-01	2001	6	5042	Northwest Teutonia-Patterson 138V	LACROYNE - WEST GARDNER 345V	1068	2115	1068	2115	11 hrs, 7 mins	3A	2	194	IMAPP/NSP AEO EES ERCE KOPL WR
07-Aug-01	2001	6	5023	LACROYNE - STILLWELL 345V	LACROYNE - WEST GARDNER 345V	1203	2117	1203	2117	9 hrs, 14 mins	3B	2	134	IMAPP/NSP AEO EES ERCE KOPL WR
07-Aug-01	2001	6	5037	Midwest-Claresville 345V	LeCroyne - West Garden 345 V	0904	2233	0904	2233	2 hrs, 5 mins	3B	1	30	IMAPP/NSP AEO EES ERCE KOPL WR
08-Aug-01	2001	6	1368	McKnight-Framlin 500V	LeCroyne - West Garden 345 V	0749	2121	0749	2121	16 hrs, 17 mins	3A	1	30	IMAPP/NSP AEO EES ERCE KOPL WR
08-Aug-01	2001	6	3042	Northwest Teutonia-Patterson 138V	LeCroyne - West Garden 345 V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR
08-Aug-01	2001	6	3706	Amol - Heddon 345 V	LeCroyne - West Garden 345 V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR
08-Aug-01	2001	6	1368	McKnight-Framlin 500V	LeCroyne - West Garden 345 V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR
08-Aug-01	2001	6	5023	LACROYNE - STILLWELL 345V	LACROYNE - WEST GARDNER 345V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR
09-Aug-01	2001	6	5042	Northwest Teutonia-Patterson 138V	LACROYNE - WEST GARDNER 345V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR
09-Aug-01	2001	6	3706	Amol - Heddon 345 V	LeCroyne - West Garden 345 V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR
09-Aug-01	2001	6	1368	McKnight-Framlin 500V	LeCroyne - West Garden 345 V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR
11-Aug-01	2001	6	1353	Wilton-Livonia 138 V	LeCroyne - West Garden 345 V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR
15-Aug-01	2001	6	3102	Blair-Francis 345V	LeCroyne - West Garden 345 V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR
18-Aug-01	2001	6	6008	COOPER-ST. JOSEPH & COOPER FAIRPORT	LeCroyne - West Garden 345 V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR
19-Aug-01	2001	6	6008	COOPER-ST. JOSEPH & COOPER FAIRPORT	LeCroyne - West Garden 345 V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR
19-Aug-01	2001	6	3102	Blair-Francis 345V	LeCroyne - West Garden 345 V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR
23-Aug-01	2001	6	3706	Amol - Heddon 345 V	LeCroyne - West Garden 345 V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR
24-Aug-01	2001	6	3706	Amol - Heddon 345 V	LeCroyne - West Garden 345 V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR
31-Aug-01	2001	6	3006	Elm - Clarksburg 345V	LeCroyne - West Garden 345 V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR
02-Sep-01	2001	6	1308	Standard-Hot Springs 500 V	LeCroyne - West Garden 345 V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR
15-Sep-01	2001	6	5008	Craig Junction-Ashdown West 138 V	LeCroyne - West Garden 345 V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR
16-Sep-01	2001	6	5008	Craig Junction-Ashdown West 138 V	LeCroyne - West Garden 345 V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR
18-Sep-01	2001	6	5003	Northwestern Station-Ontario 345 V	LeCroyne - West Garden 345 V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR
23-Sep-01	2001	6	1353	Tremont-Greenwood 115 V	LeCroyne - West Garden 345 V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR
23-Sep-01	2001	6	5003	Northwestern Station-Ontario 345 V	LeCroyne - West Garden 345 V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR
23-Sep-01	2001	6	5008	Craig Junction-Ashdown West 138 V	LeCroyne - West Garden 345 V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR
26-Sep-01	2001	6	3006	Elm - Clarksburg 345V	LeCroyne - West Garden 345 V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR
27-Sep-01	2001	6	3006	Elm - Clarksburg 345V	LeCroyne - West Garden 345 V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR
12-Oct-01	2001	6	1313	Van Fly-Lep-1060 138 V	LeCroyne - West Garden 345 V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR
12-Oct-01	2001	6	1313	Van Fly-Lep-1060 138 V	LeCroyne - West Garden 345 V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR
24-Oct-01	2001	6	5008	Craig Junction-Ashdown West 138 V	LeCroyne - West Garden 345 V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR
28-Oct-01	2001	6	3023	LeCroyne - West Garden 345 V	LeCroyne - West Garden 345 V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR
28-Oct-01	2001	6	3023	LeCroyne - West Garden 345 V	LeCroyne - West Garden 345 V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR
28-Oct-01	2001	6	3023	LeCroyne - West Garden 345 V	LeCroyne - West Garden 345 V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR
30-Oct-01	2001	6	1354	Climon-H.W. Jackson SS 115 V	LeCroyne - West Garden 345 V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR
31-Oct-01	2001	6	1354	Climon-H.W. Jackson SS 115 V	LeCroyne - West Garden 345 V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR
07-Nov-01	2001	11	1354	Climon-H.W. Jackson SS 115 V	LeCroyne - West Garden 345 V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR
07-Nov-01	2001	11	1354	Climon-H.W. Jackson SS 115 V	LeCroyne - West Garden 345 V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR
17-Nov-01	2001	11	3171	Elm - Clarksburg 345V	LeCroyne - West Garden 345 V	0837	2234	0837	2234	14 hrs, 41 mins	3A	3	82	IMAPP/NSP AEO EES ERCE KOPL WR

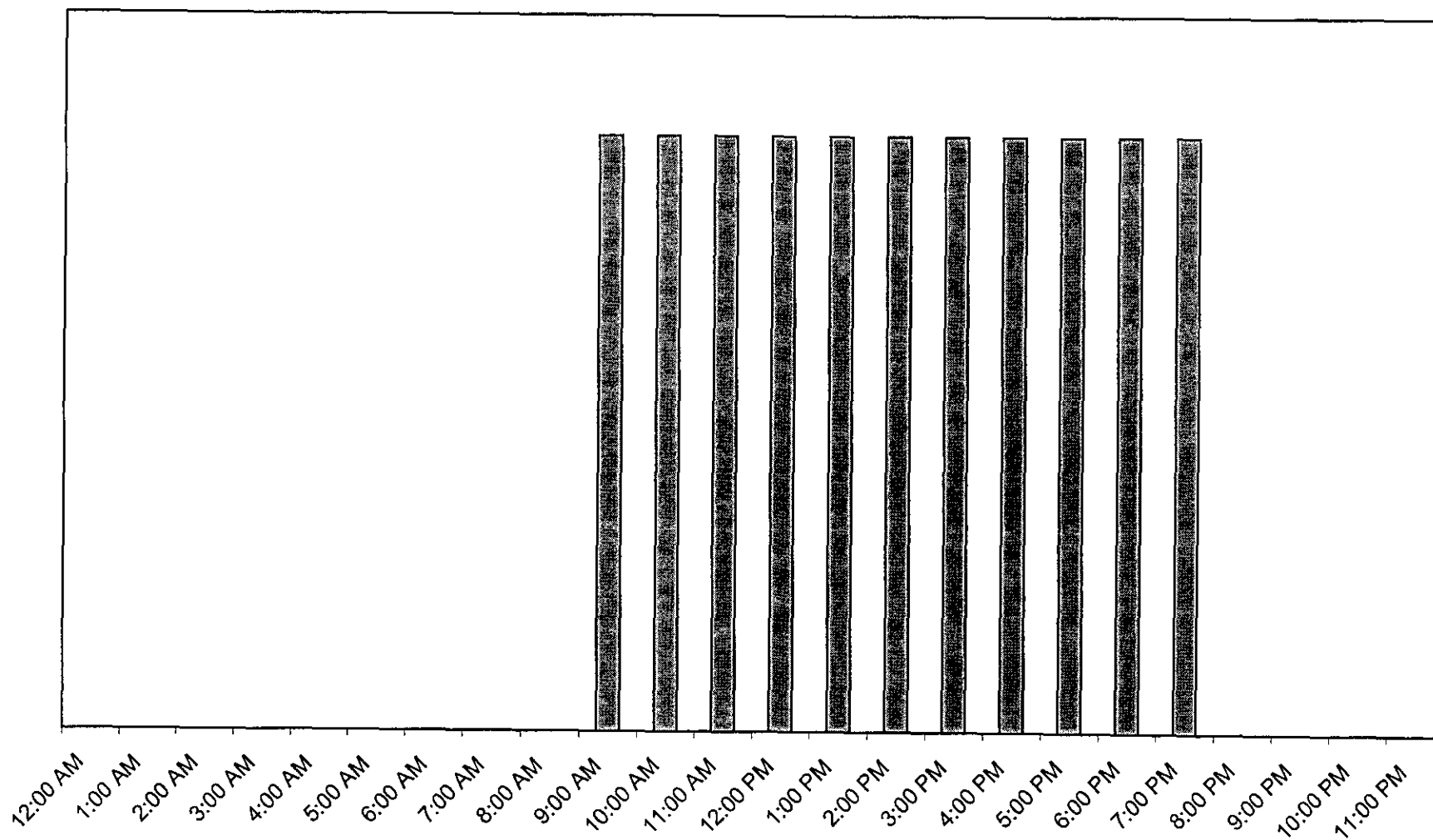
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Date	Year	Unit	EG ID	Line/Energy	Cont./Elev/Type	Start Time	Permit To Work	Duration	Actual Start	Actual End	High Voltage	Low Voltage	Impact to ER
05-Jun-02	2002	6	6068	Genoa-Seneca 161 kV & Eau Claire-Arpin 345kV		6/5/2002 07 m	6/5/2002 22 m	14.83 3A	N/A	14.83 3A	N/A	N/A	(MAPP)NSP
06-Jun-02	2002	6	6007	Gentleman-Red Willow 345kV Line		6/6/2002 11 m	6/6/2002 23 m	11.97 3B	N/A	11.97 3B	N/A	N/A	(MAPP)NSP
07-Jun-02	2002	6	1030	New Madrid 345/500		6/7/2002 06 m	6/7/2002 20 m	14.20 3A	NS	14.20 3A	NS	466	AECl EES ERCE
07-Jun-02	2002	6	6023	North Platte-Stockville 115kV & Gentleman-Red Willow 345kV		6/7/2002 09 m	6/7/2002 23 m	14.20 3A	N/A	14.20 3A	N/A	N/A	(MAPP)NSP
08-Jun-02	2002	6	1020	New Madrid 345/500		6/8/2002 07 m	6/8/2002 22 m	14.52 3A	NS	14.52 3A	NS	869	AECl EES ERCE
08-Jun-02	2002	6	1020	New Madrid 345/500		6/8/2002 10 m	6/8/2002 23 m	13.45 3A	NS	13.45 3A	NS	102	AECl EES ERCE
10-Jun-02	2002	6	3006	Eau Claire - Arpin 345	None	6/10/2002 08 m	6/10/2002 10 m	1.92 3A	0	1.92 3A	0	0	(MAPP)NSP
11-Jun-02	2002	6	3006	Eau Claire - Arpin 345	None	6/11/2002 06 m	6/11/2002 22 m	16.68 3A	6-NN	16.68 3A	6-NN	432	(MAPP)NSP
12-Jun-02	2002	6	6007	Gentleman to Red Willow 345kV		6/12/2002 18 m	6/13/2002 01 m	8.47 3B	N/A	8.47 3B	N/A	N/A	(MAPP)NSP
11-Jun-02	2002	6	6007	Gentleman to Red Willow 345kV		6/11/2002 18 m	6/13/2002 15 m	45.39 3A	N/A	45.39 3A	N/A	N/A	(MAPP)NSP
12-Jun-02	2002	6	6007	GENTLEMAN-RED WILLOW 345kV		6/12/2002 18 m	6/14/2002 01 m	32.47 3B	N/A	32.47 3B	N/A	N/A	(MAPP)NSP
15-Jun-02	2002	6	6007	GENTLEMAN-RED WILLOW 345kV		6/15/2002 11 m	6/16/2002 21 m	9.97 3B	N/A	9.97 3B	N/A	N/A	(MAPP)NSP
15-Jun-02	2002	6	6007	GENTLEMAN-RED WILLOW 345kV		6/16/2002 12 m	6/16/2002 23 m	10.78 3B	N/A	10.78 3B	N/A	N/A	(MAPP)NSP
19-Jun-02	2002	6	6004	MWSI - (Minnesota Wisconsin Stability Interface)	Eau Claire-Arpin & Prairie Island-Byron 345kV lines	6/20/2002 08 m	6/20/2002 22 m	14.28 3B	6-NN	14.28 3B	6-NN	84	(MAPP)NSP
20-Jun-02	2002	6	5023	LaCygne-Silwell 345 kV line	LaCygne-West Gardner 345 kV line	6/20/2002 11 m	6/20/2002 19 m	7.22 3A	1	7.22 3A	1	336	(MAPP)NSP AECl EES KCPL WR
21-Jun-02	2002	6	5078	South Coffeyville - Deering 138 kV line	Delaware - Neesho 345 kV line	6/21/2002 10 m	6/21/2002 18 m	6.96 3A	1,2	6.96 3A	1,2	329	CSWS GDA
21-Jun-02	2002	6	5023	LaCygne - Silwell 345 kV line	LaCygne-West Gardner 345 kV line	6/21/2002 13 m	6/21/2002 19 m	6.58 3A	7	6.58 3A	7	52	(MAPP)NSP AECl EES KCPL WR
24-Jun-02	2002	6	5078	South Coffeyville - Deering 138kV	Delaware - Neesho 345kV	6/24/2002 09 m	6/24/2002 18 m	9.15 3A	6	9.15 3A	6	597	CSWS GDA
24-Jun-02	2002	6	5073	Bartlesville SE - North Bartlesville 138 KV	Northeast Station - Delaware 345KV	6/24/2002 09 m	6/24/2002 19 m	9.07 3A	8	9.07 3A	8		CSWS GDA
24-Jun-02	2002	6	5023	LaCygne - Silwell 345KV	LaCygne - West Gardner 345 KV	6/24/2002 10 m	6/24/2002 19 m	0.52 3A	2	0.52 3A	2	88	(MAPP)NSP AECl EES KCPL WR
24-Jun-02	2002	6	5023	LaCygne - Silwell 345KV	LaCygne - West Gardner 345 KV	6/24/2002 13 m	6/24/2002 18 m	5.07 3A	3-ND	5.07 3A	3-ND	254	(MAPP)NSP AECl EES KCPL WR
24-Jun-02	2002	6	6004	Genoa-Coulee 161 to Genoa-LaCrosse-Mansfield 161	Genoa-Coulee 161 & Genoa-LaCrosse-Mansfield 161	6/24/2002 14 m	6/24/2002 16 m	1.57 3B	6-NN	1.57 3B	6-NN	656	(MAPP)NSP
25-Jun-02	2002	6	5042	N.W. Tezakana - Patterson 138 KV	Eau Claire-Arpin & Prairie Island-Byron 345kV lines	6/24/2002 23 m	6/25/2002 14 m	14.60 3A	2	14.60 3A	2	100	ERCE
25-Jun-02	2002	6	5042	N.W. Tezakana - Patterson 138 KV	Lydia - Valliant 345 KV	6/25/2002 08 m	6/25/2002 16 m	8.47 3A	6	8.47 3A	6	910	CSWS GDA
25-Jun-02	2002	6	1634	Volunteer-Bull Run 500kV	Delaware - Neesho 345kV	6/25/2002 10 m	6/25/2002 19 m	10.15 3A	NN	10.15 3A	NN	181	(M

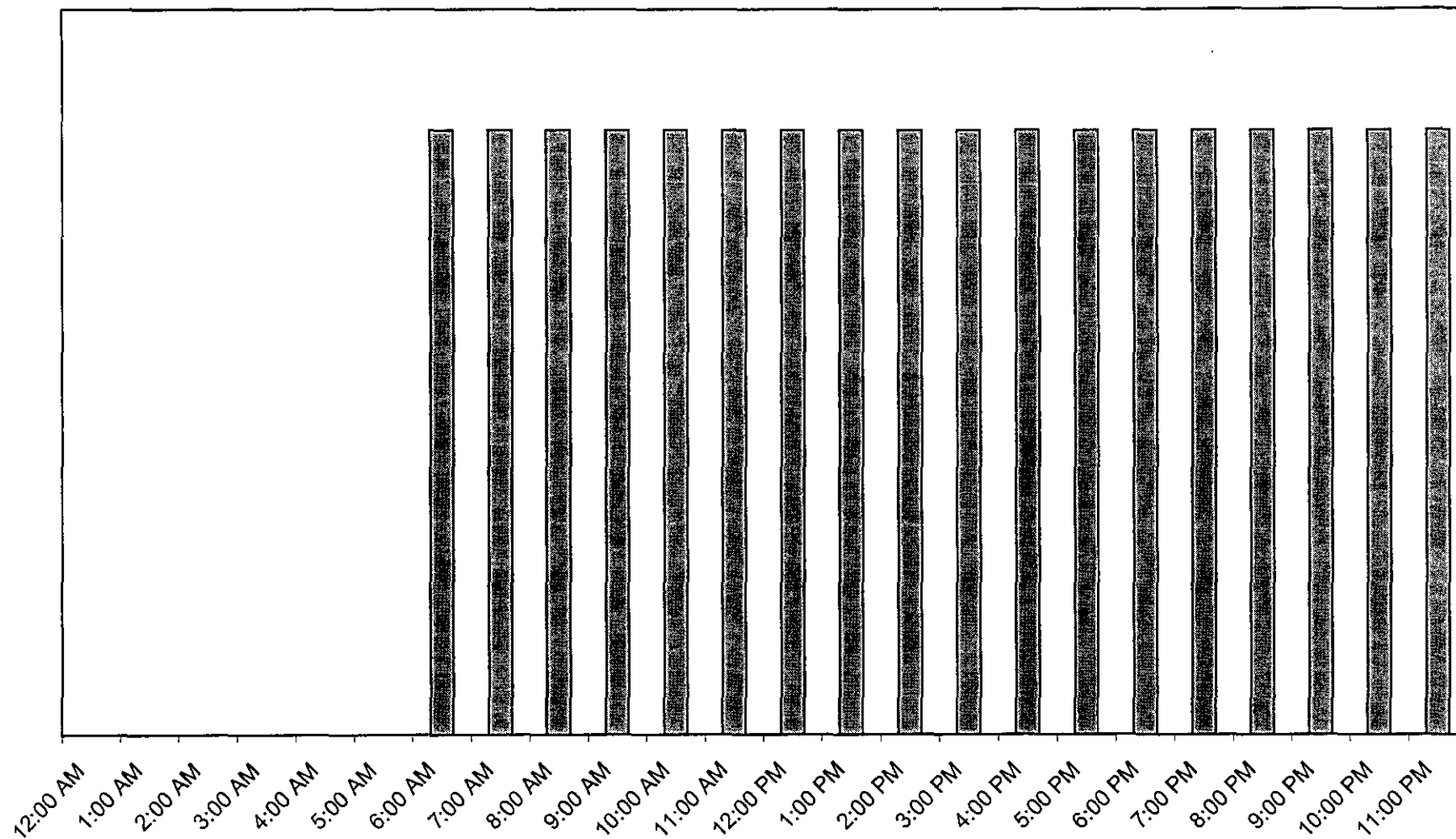
**Summary of TLR Events
Involving Deliveries to EDE
on Monday July 2, 2001**



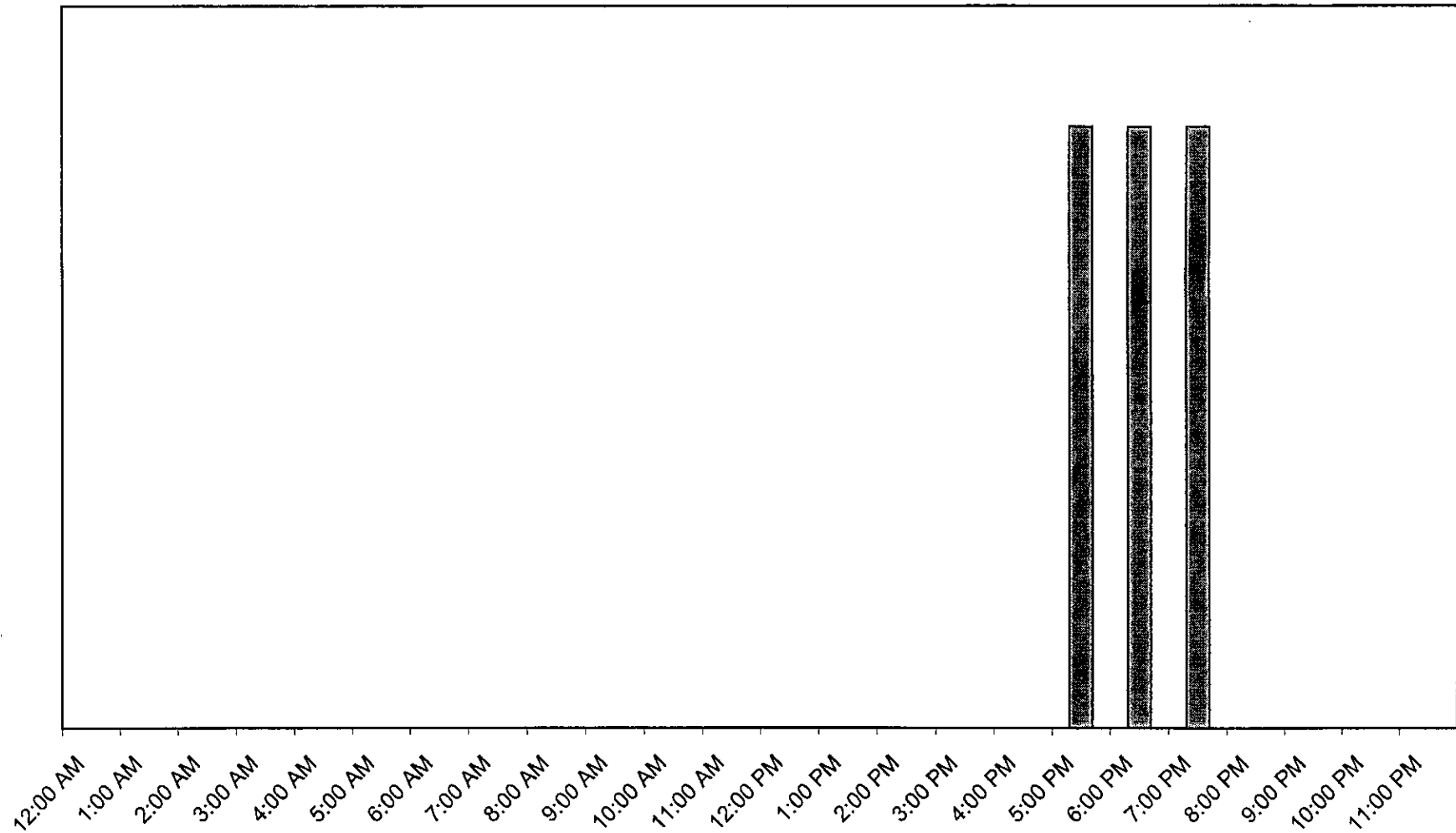
**Summary of TLR Events
Involving Deliveries to EDE
on Monday July 9, 2001**



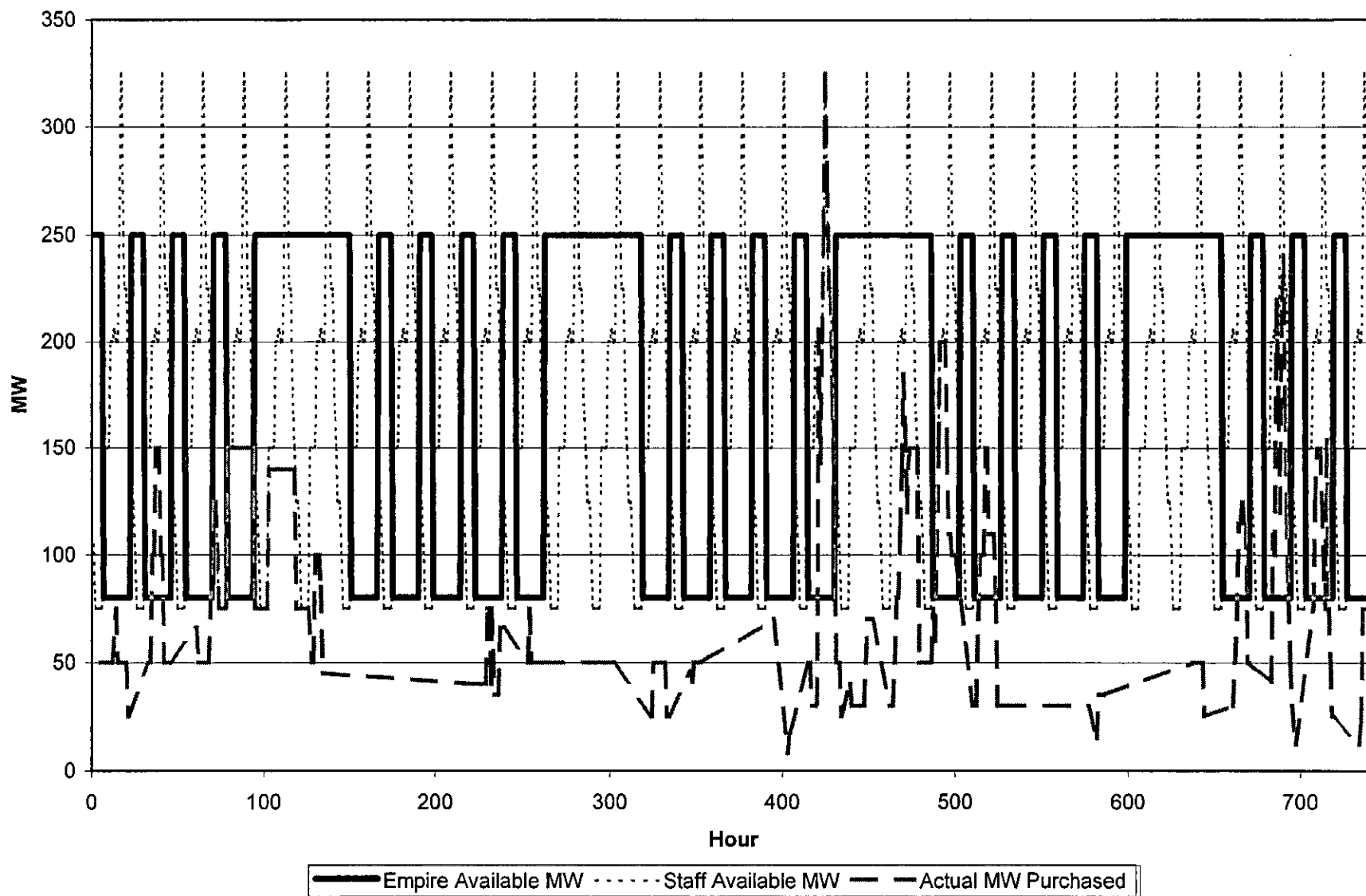
**Summary of TLR Events
Involving Deliveries to EDE
on Wednesday August 8, 2001**



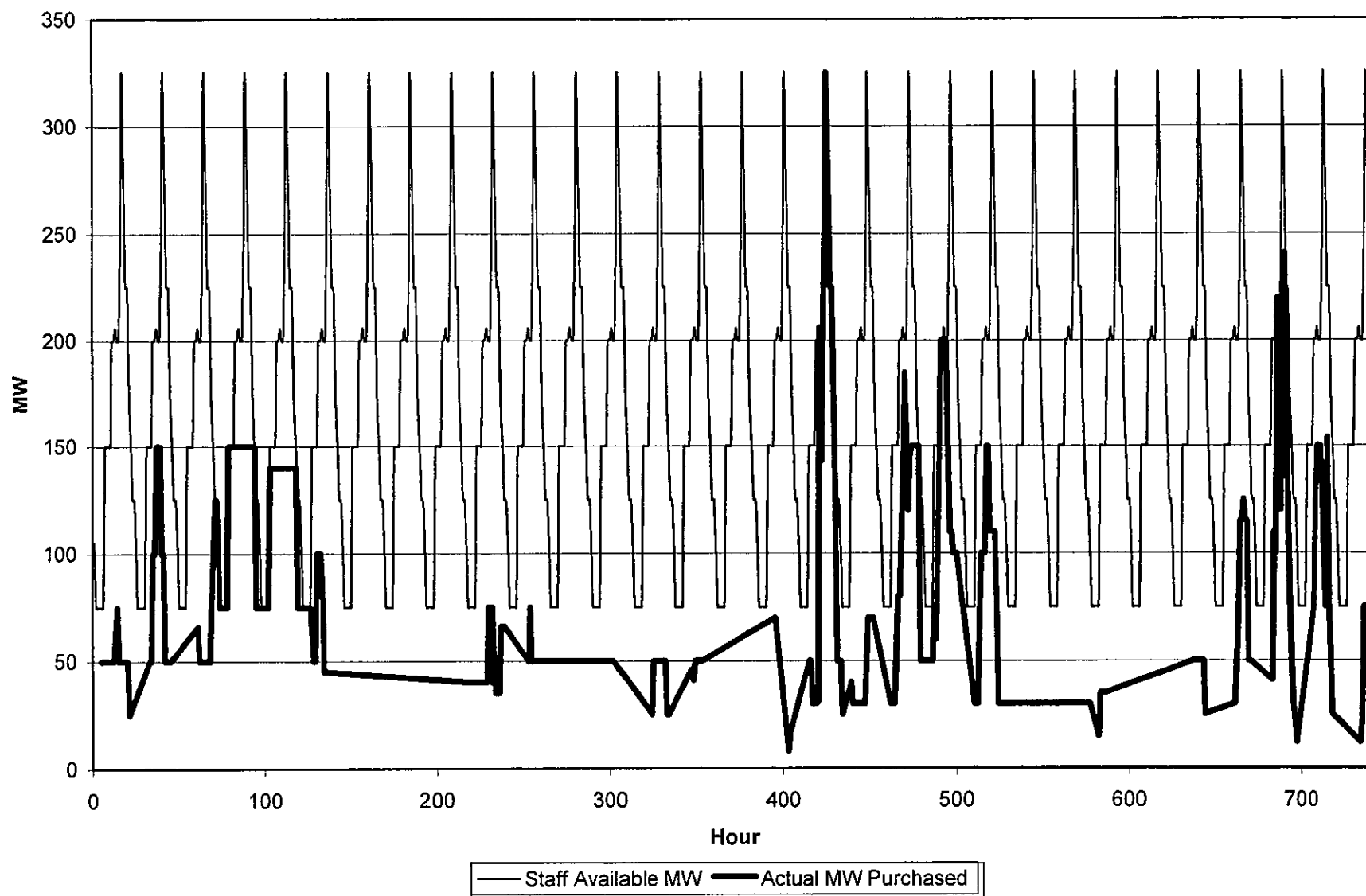
**Summary of TLR Events
Involving Deliveries to EDE
on Wednesday August 15, 2001**



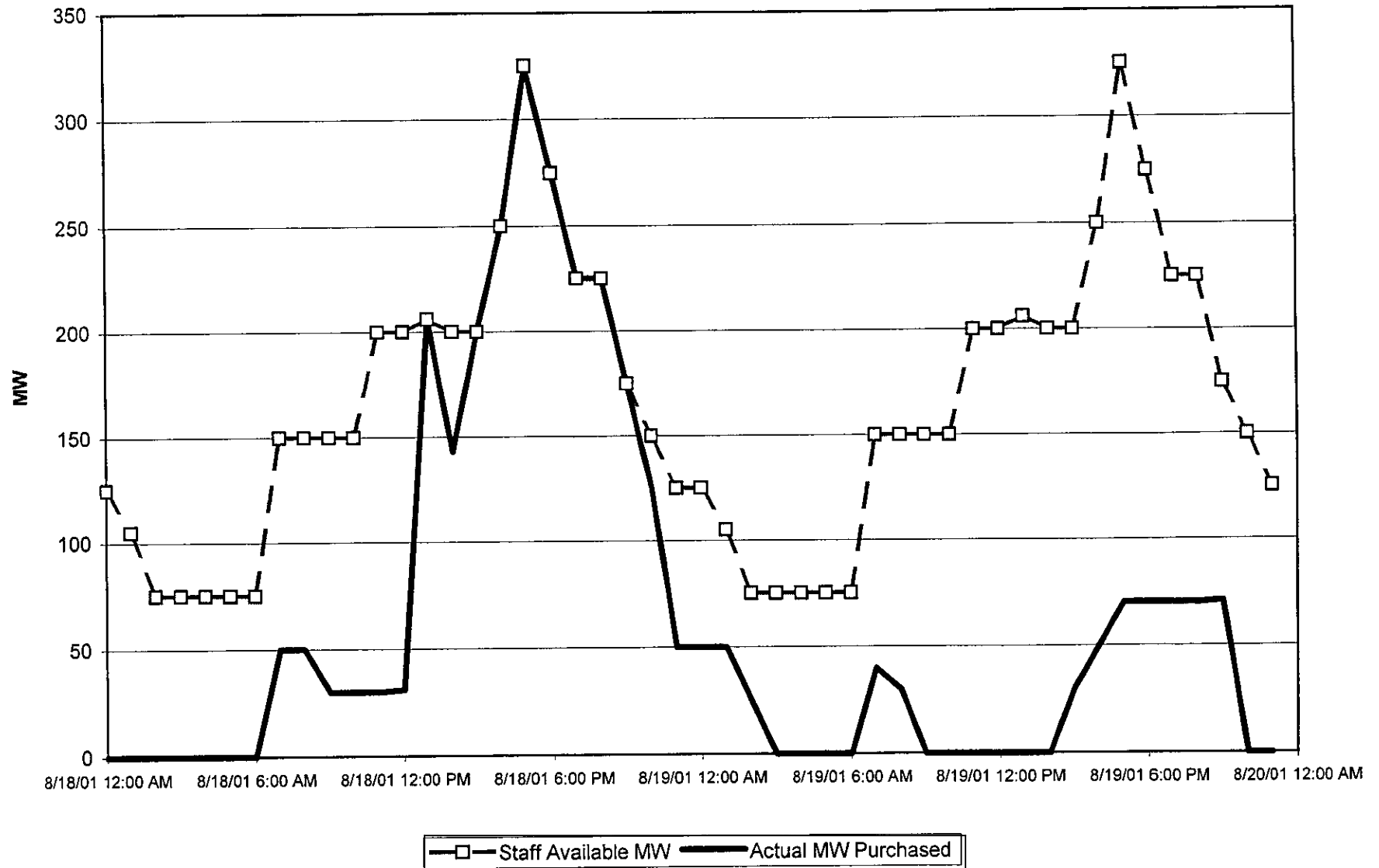
August MW Availability



August MW Availability



August 18 and 19, 2001 MW Availability



Daily Operations Report

Saturday, August 18, 2001

Time	Operation
0000,	Iatan is still reduced to approximately 617 MW due to boiler problems, EDE share approximately 74 MW.
0145,	Iatan reducing load due to a tube leak.
0153,	Riverton Sub 167 CB 6906 relayed and reclosed.
0153,	Baxter Springs Sub 271 CB 6957 relayed and reclosed.
0300,	Iatan reduced to approximately 325 MW due to boiler tube leak, EDE share approximately 39 MW.
0415,	Iatan tripped off line due to boiler tube leak.
1157,	State Line Sub 439, Unit 2-3 tripped off line.
1158,	Operating Reserve Contingency, received 38MW.
1158,	State Line Sub 439, Units 2-1 and 2-2 tripped off line.
1203,	Operating Reserve Contingency, received 150 MW.
1228,	Operating Reserve Contingency, received 78 MW.
1316,	Operating Reserve Contingency, received 58 MW.
1415,	State Line Sub 439, Unit 2-1 on line.
1430,	Energy Center Sub 382, Unit 2 available.
1502,	State Line Sub 439, Unit 2-1 off line.

Thursday, September 19, 2002

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Daily Operations Report

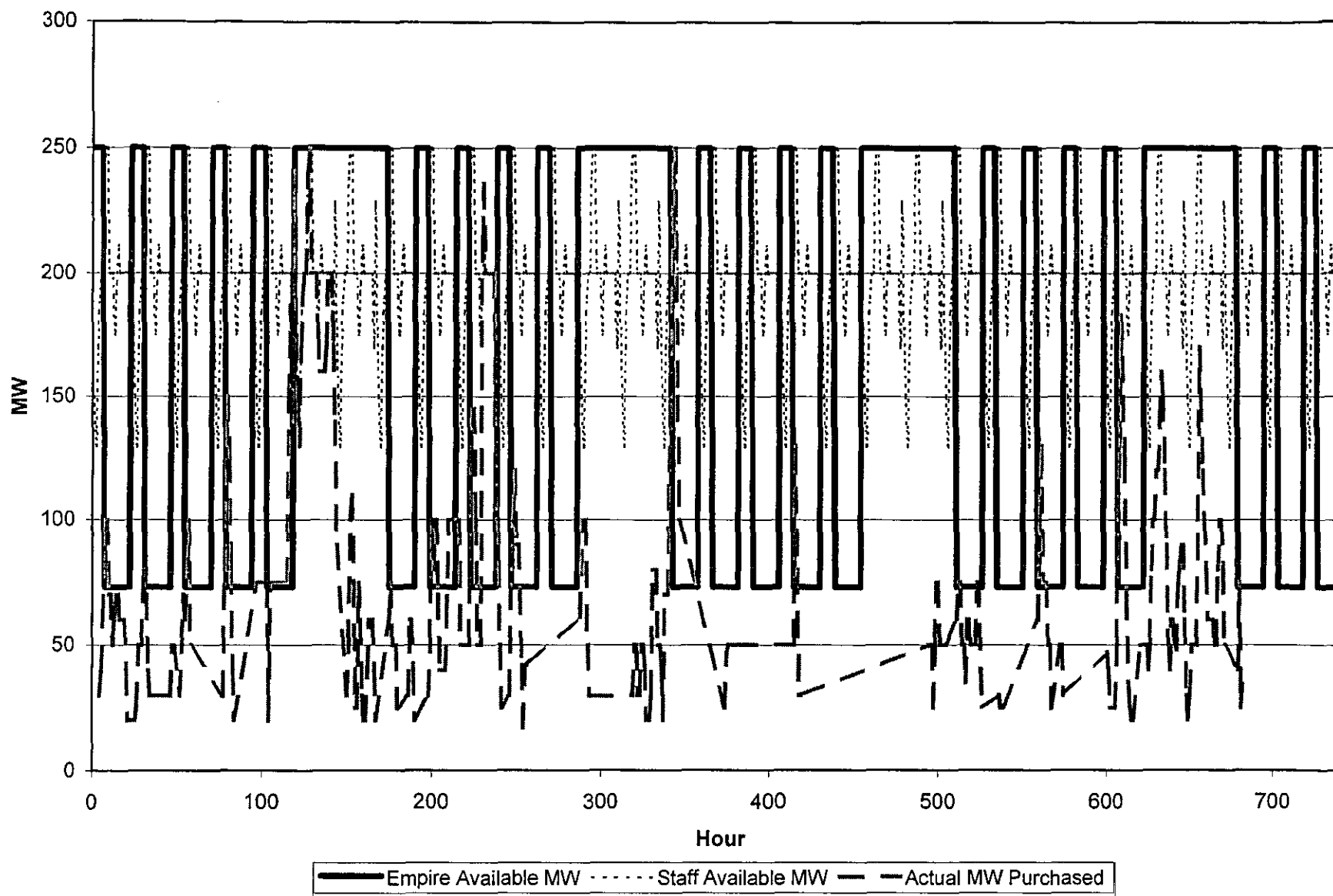
Wednesday, August 28, 2001

Time	Operation
0000,	Noel Southwest Sub 435 to Noel Sub 443 has been open for contractors since 0909, August 27th.
0000,	Iatan is still reduced to approximately 608 MW due to boiler problems, EDE share approximately 73 MW.
0726, 1730,	Oronogo Junction Sub 110 to Oakland East Sub 280, 69 KV line opened for contractor, closed and normal at 1730.
0834,	Decatur North Sub 326 to Gravette Sub 700, 69 KV line opened for contractor, closed and normal at 1153.
0909,	Riverton Unit 10 on line, off line at 1641.
0917,	Riverton Unit 9 on line, off line at 1634.
1004,	State Line Sub 439 CB 16122 opened to replace gas, closed and normal at 1034
1046,	State Line Unit 2-3 tripped off line.
1048,	State Line Unit 2-1 tripped off line.
1055,	Stockton Northwest Sub 324 to Caplinger Sub 304, 34 KV line opened to install a new Sub. Station, closed and normal at 1405.
1056,	Operating Reserve Contingency, received 158 MW.
1126,	Energy Center Unit 2 on line.
1133,	State Line Unit 1 on line, off line at 1708.
1358,	Ash Grove Sub 121 station check, normal at 1434.
1438,	Energy Center Unit 1 on line.
1705,	State Line Unit 2-3 on line, tripped off at 1708.
1715,	State Line Unit 2-2 tripped off line.
1718,	Operating Reserve Contingency, received 29 MW.

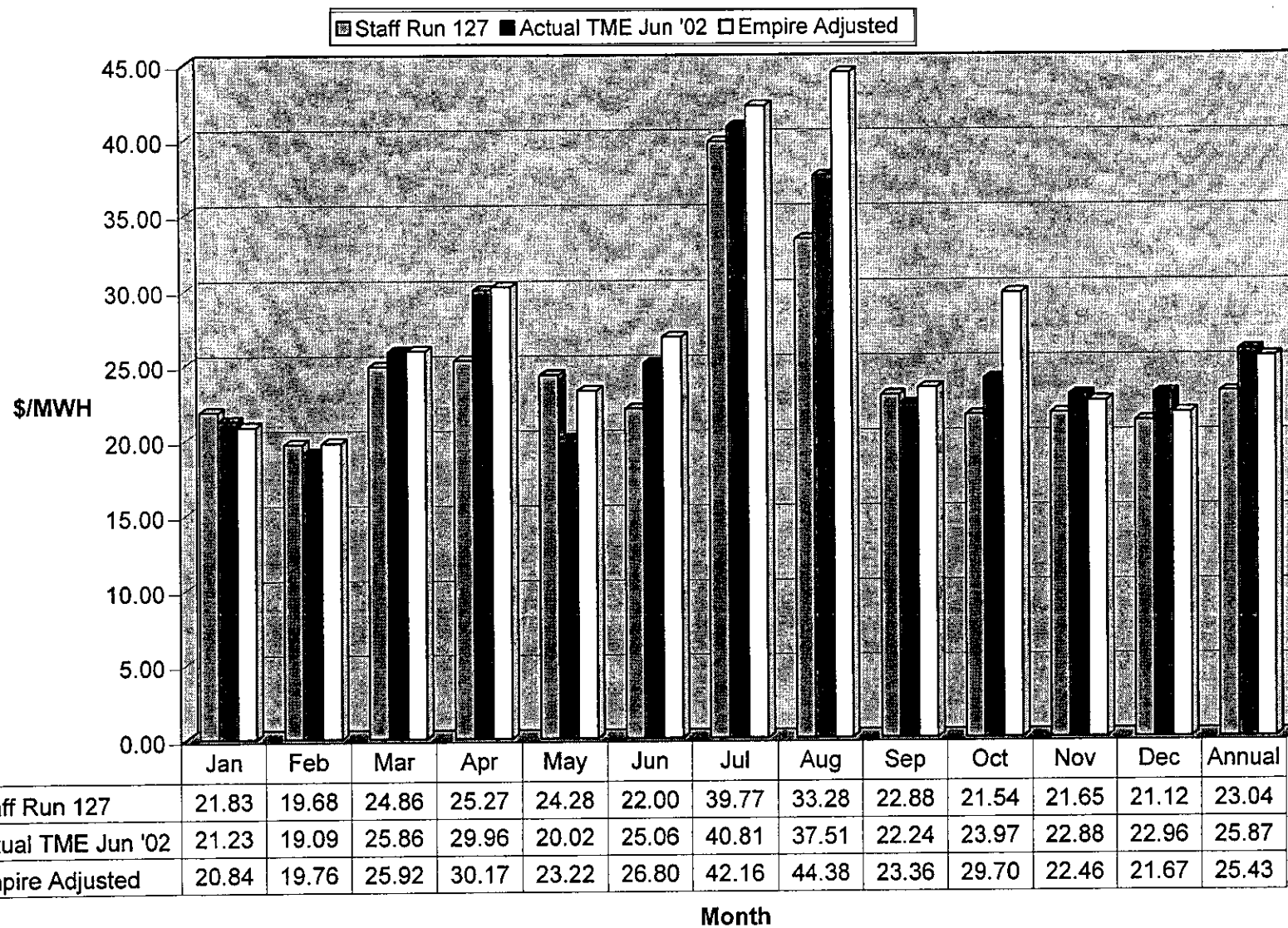
Thursday, September 19, 2002

Page 1 of 1

January MW Availability



Purchase Power Output Prices



AFFIDAVIT

STATE OF MISSOURI)
) ss
COUNTY OF JASPER)

On the 20th day of September, 2002, before me appeared Brad P. Beecher, to me personally known, who, being by me first duly sworn, states that he is the Vice President – Energy Supply of The Empire District Electric Company and acknowledged that he has read the above and foregoing document and believes that the statements therein are true and correct to the best of his information, knowledge and belief.

Brad P. Beecher

Brad P. Beecher

Subscribed and sworn to before me this 20th day of September, 2002

Donna M. Longan

Donna M. Longan, Notary Public

My commission expires: January 24, 2004

