

Exhibit No.:
Issue: Fuel Adjustment
Witness: Todd W. Tarter
Type of Exhibit: Direct Testimony
Sponsoring Party: Empire District Electric
File No. ER-2016-
Date Testimony Prepared: April 2016

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

Direct Testimony

Of

Todd W. Tarter

April 2016

DIRECT TESTIMONY
OF
TODD W. TARTER
THE EMPIRE DISTRICT ELECTRIC COMPANY
BEFORE THE
PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI
FILE NO. ER-2016-

1 **INTRODUCTION AND QUALIFICATIONS**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. My name is Todd W. Tarter and my business address is 602 S. Joplin Avenue,
4 Joplin, Missouri.

5 **Q. BY WHOM ARE YOU EMPLOYED AND WHAT IS YOUR JOB TITLE?**

6 A. I am presently employed by The Empire District Electric Co. (“Empire” or “the
7 Company”) as the Manager of Strategic Planning.

8 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL
9 BACKGROUND FOR THE COMMISSION.**

10 A. I graduated from Pittsburg State University in 1986 with a Bachelor of Science
11 Degree in Computer Science. After graduation I received a mathematics education
12 certification. I began my employment with Empire in May 1989. During my tenure
13 with Empire I have worked in the Corporate Planning, Strategic Planning,
14 Information Technology, and Planning and Regulatory departments. My primary
15 responsibilities during this time have included work with the Company’s
16 construction budget, load forecasts, sales and revenue budgets, financial forecasts
17 and fuel and purchased power projections, among others. In September 2004, I was

1 promoted to my current position where I primarily work with fuel and purchased
2 power projections, energy efficiency and integrated resource planning.

3 **Q. HAVE YOU EVER TESTIFIED BEFORE THIS OR ANY OTHER STATE**
4 **UTILITY COMMISSION?**

5 A. Yes. I have testified on behalf of Empire before the Missouri Public Service
6 Commission, the Kansas Corporation Commission, the Corporation Commission of
7 Oklahoma and the Arkansas Public Service Commission. The case references are
8 attached to this testimony as Schedule TWT-1.

9 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

10 A. My testimony will support the Fuel & Purchased Power Adjustment Clause
11 (“FAC”) rate schedules that have been filed by Empire to reflect the actual energy
12 costs that Empire has incurred during the six-month period September 2015
13 through February 2016. This six-month period is an Accumulation Period specified
14 in Empire’s FAC tariff that was approved by the Missouri Public Service
15 Commission (“Commission”) in its Report and Order issued in File No. ER-2014-
16 0351.

17 **EXECUTIVE SUMMARY**

18 **Q. PLEASE PROVIDE AN OVERVIEW OF YOUR TESTIMONY IN**
19 **SUPPORT OF THE FAC RATE SCHEDULES FILED BY EMPIRE.**

20 A. The Commission’s rule governing fuel and purchased power cost recovery
21 mechanisms for electric utilities – specifically 4 CSR 240-20.090(4) – requires
22 Empire to make periodic FAC filings that are designed to enable Commission
23 review of the actual fuel costs, purchased power costs, cost of consumables

1 associated with the power plants' air quality control system ("AQCS"), net cost of
2 emission allowances, revenue from the sale of renewable energy credits ("REC"), a
3 portion of transmission costs and off-system sales margins (collectively referred to
4 as total energy costs) that the Company has incurred during an Accumulation
5 Period. In addition, these periodic filings are designed to adjust the FAC rates up
6 or down, to reflect the actual energy costs incurred during the Accumulation Period.
7 Empire's FAC tariff calls for two annual filings: a filing covering the six-month
8 Accumulation Period running from September through February and a second filing
9 covering the Accumulation Period running from March through August. Any
10 increases or decreases in rates that are approved by the Commission, or that take
11 effect by operation of law, are then collected from or refunded to customers over
12 two six-month Recovery Periods: June through November and December through
13 May.

14 Since the implementation of Empire's FAC, the variable cost of fuel and purchased
15 power used by the Company's Missouri customers has varied from the base fuel
16 and energy cost established in rates. For the Accumulation Period September 2015
17 through February 2016, Empire's actual total energy costs eligible for the FAC have
18 been lower than the base energy costs included in the Company's Missouri rates by
19 approximately \$4,256,020. In accordance with the FAC tariff, Empire has retained
20 5% of the overall decrease in Missouri variable energy costs during that six-month
21 period. Therefore, in accordance with the Commission's FAC rule and Empire's
22 approved FAC tariff, the Company has filed FAC rate schedules that are designed
23 to refund 95 percent of the energy cost differences of approximately \$4,043,219 to

1 its Missouri jurisdictional customers.

2 In addition, Empire also seeks to refund approximately \$225,112 which is further
3 described in the true-up testimony that is provided in a separate filing, of over-
4 recovered energy costs from the Recovery Period ending November 30, 2015. This
5 brings the total net refund to approximately \$4,286,804 including interest. This
6 total represents the Fuel and Purchased Power Adjustment (“FPA”).

7 As reflected in the rate schedules filed by the Company, Empire has developed two
8 Fuel Adjustment Rates (“FAR”) designed to recover the FPA, each of which is
9 based on forecasted retail Missouri sales over the next Recovery Period: a FAR of
10 \$(0.00204) per kilowatt-hour (kWh) for primary service, and a FAR of \$(0.00207)
11 per kWh for secondary service have been developed for this filing. These FARs
12 will enable Empire to refund over a Recovery Period ending November 2016 the
13 difference between base energy costs built into its rates and the total energy costs
14 that were actually incurred during the Accumulation Period and the true-up of fuel
15 and energy costs during the Recovery Period ended November 30, 2015.

16 **Q. DOES THE EMPIRE FAC TARIFF INCLUDE PROVISIONS THAT ARE**
17 **DESIGNED TO LIMIT EMPIRE’S FAC RECOVERIES TO THE ACTUAL**
18 **COST OF ENERGY?**

19 A. Yes. The Empire FAC and the Commission’s rule governing FACs include two
20 safeguards that limit FAC recovery to actual, prudently-incurred energy costs. The
21 first safeguard is a true-up process that ensures that the FAC collections during the
22 Recovery Period do not exceed actual energy costs incurred during the
23 Accumulation Period. The second safeguard involves a requirement that Empire’s

1 energy costs be subjected to periodic Prudence Reviews, which will ensure that
2 only prudently-incurred energy costs are passed through to customers using the
3 FAC. Empire's operation of the FAC has been audited by the Commission's staff
4 through February 28, 2015 and no disallowances have been recommended.

5 **THE PROPOSED FAC RATE ADJUSTMENT**

6 **Q. WHY HAS EMPIRE FILED FAC-RELATED RATE SCHEDULES AT THIS**
7 **TIME?**

8 A. The Commission's rules – specifically 4 CSR 240-20.090(4) – and Empire's FAC
9 tariff require the Company to make periodic FAC filings that enable the
10 Commission to review Empire's actual fuel, purchased power, AQCS costs, a
11 portion of transmission costs, off-system sales, REC revenue, and net costs of
12 emissions allowances so that Empire's FAC rates can be adjusted to reflect the
13 actual energy costs the Company incurs to provide electric service to its Missouri
14 customers. Empire's Missouri FAC tariff calls for two FAC adjustment filings per
15 year: a filing covering the six-month Accumulation Period running from September
16 through February and a second filing covering the Accumulation Period running
17 from March through August. Empire is seeking a decrease in its FAC rates to
18 reflect 95% of the difference between the base energy costs built into its base
19 Missouri rates and Empire's actual Missouri energy costs for the Accumulation
20 Period, plus a true-up of the costs recovered during the Recovery Period ending
21 November 30, 2015. This recovery via FAC rates will be reflected on the Missouri
22 customers' bills over the six-month Recovery Period running from June 2016
23 through November 2016.

1 **Q. HOW HAVE EMPIRE'S AVERAGE ENERGY COSTS CHANGED OVER**
2 **THE COST INCLUDED IN BASE RATES DURING THE**
3 **ACCUMULATION PERIOD?**

4 A. Empire's average energy costs per kWh have decreased below the level built into
5 its base electric rates, which is why the FAC rate schedules filed by the Company
6 seek a decrease in the rates charged to the Missouri customers. More specifically,
7 Empire's Missouri base rates included an average cost of energy per kWh of net
8 system production of \$0.02684 during the Accumulation Period of September 2015
9 through February 2016. Empire actually incurred average energy costs of
10 \$0.02482 per kWh during the Accumulation Period. This represents an overall
11 decrease in average energy costs of \$0.00202 per kWh during the Accumulation
12 Period, or about 7.52 percent lower than the average cost built into base rates.
13 Pursuant to Empire's FAC tariff, Empire is requesting to refund its Missouri
14 customers the net of 95 percent of this cost decrease plus approximately \$225,112
15 of over recovered energy cost and \$18,473 of interest expense from the Recovery
16 Period ending November 30, 2015, or an average of \$(0.00195) per kWh sold
17 during the upcoming Recovery Period.

18 **Q. PLEASE BRIEFLY DESCRIBE THE REASONS FOR THE DECREASE IN**
19 **THE AVERAGE ENERGY COST DURING THE ACCUMULATION**
20 **PERIOD?**

21 A. As previously noted, the average total energy cost for the period was about 7.52
22 percent lower than the base. Contributing to this result was lower fuel and market
23 prices (primarily lower natural gas prices) during the Accumulation Period of

1 September 2015 through February 2016 than what was utilized to develop the
2 current FAC base factor. Additionally, the period experienced a very mild winter.
3 October 2015 through February 2016 were all below their 30-year normal heating
4 degree day levels. This lack of cumulative weather effect dampened sales levels,
5 contributing to the lower average total energy cost for the period.

6 **Q. HOW DOES THE MONTHLY FAC CHANGE FOR A TYPICAL**
7 **RESIDENTIAL CUSTOMER?**

8 A. For Missouri residential customers using 1,000 kWh per month, the electric bill
9 will decrease by approximately \$0.35 per month over the six-month period June
10 2016 through November 2016, when the current FAC credit factor of \$(0.00207) is
11 applied to their bill and the previous FAC credit factor of \$(0.00172) is eliminated
12 from their bill.

13 **Q. DID THE AVERAGE ENERGY COST VARY FROM EXPECTATIONS?**

14 A. The actual total energy cost per megawatt-hour was below Empire's forecast for
15 this time-period by approximately 7.52 percent.

16 **Q. DO YOU EXPECT THE AVERAGE ENERGY COSTS ELIGIBLE FOR**
17 **THE FAC TO BE HIGHER OR LOWER THAN THE BASE DURING THE**
18 **NEXT ACCUMULATION PERIOD FROM MARCH 2016 THROUGH**
19 **AUGUST 2016?**

20 A. Based on the current budget, the current FAC base factor, and the existing FAC
21 components, we expect the total energy costs eligible for the FAC to be about 2%
22 higher than the base cost built into Missouri electric rates.

23 **Q. DO YOU BELIEVE EMPIRE'S FUEL ADJUSTMENT CLAUSE IS**

1 **REASONABLE AND APPROPRIATE?**

2 A. Yes. The design of the Commission's rule governing the FAC was the subject of
3 much discussion and debate prior to being approved by the Commission. In
4 addition, there was much discussion and debate concerning Empire's FAC tariff in
5 Case No. ER-2008-0093. This was the case in which the Commission ultimately
6 approved Empire's initial FAC tariff. Additional discussions have occurred in
7 subsequent cases. Empire's FAC filing is being made in accordance with the
8 Commission's rules governing the FAC and in accordance with the FAC tariff
9 approved for Empire.

10 **Q. PLEASE DESCRIBE HOW EMPIRE IS PROPOSING TO REFUND THE**
11 **ENERGY COST DECREASES EXPERIENCED DURING THE**
12 **SEPTEMBER 2015-FEBRUARY 2016 ACCUMULATION PERIOD?**

13 A. The FAC rate schedule filed by Empire will refund the energy cost decrease
14 actually incurred during the Accumulation Period by applying the negative Fuel
15 Adjustment Rate or FAR of \$(0.00204) for primary and \$(0.00207) for secondary
16 service to the actual Missouri retail kWh sales that take place during the June 1,
17 2016 to November 30, 2016 Recovery Period. The proposed FARs were calculated
18 in accordance with Empire's authorized FAC tariff. I have attached to my
19 testimony, as Schedule TWT-2, a copy of one of Empire's approved FAC tariff
20 sheets. In addition to the tariff sheet, I have included as page 2 of Schedule TWT-2
21 a monthly analysis of the energy costs and energy cost recovery that has taken place
22 during the Accumulation Period. Schedule TWT-2 contains the basic information
23 and FAC formula that Empire used to calculate the FARs that have been included

1 in the proposed revised FAC rate schedule sheet 17t. The Empire FAC tariff and
2 the formula included therein were approved by the Commission in File No. ER-
3 2014-0351.

4 **Q. HOW WERE THE VARIOUS VALUES USED TO DETERMINE THE**
5 **PROPOSED FARS THAT ARE SHOWN ON SCHEDULE TWT-2**
6 **DEVELOPED?**

7 A. The data upon which Empire based the values for each of the variables in the
8 approved FAR formula are included on the schedule, and came from Empire's
9 books and records. Schedule TWT-2 contains all of the basic information that is
10 required to calculate the proposed change in the FAR. In addition, I have filed the
11 detailed information required by 4 CSR 240-3.161(7) (A) with this testimony as a
12 separate set of supporting workpapers. Additional information about the true-up
13 amount was filed concurrently in a separate docket. In addition, as required by 4
14 CSR 240-3.161(7) (B), I have separately provided to all parties of record in Case or
15 File Nos. ER-2008-0093, ER-2010-0130, ER-2011-0004, ER-2012-0345 and ER-
16 2014-0351 with a set of these workpapers.

17 **Q. IS EMPIRE IN COMPLIANCE WITH THE PROVISIONS OF THE**
18 **COMMISSION'S FAC RULE CONCERNING PERIODIC REPORTING**
19 **AND SURVEILANCE?**

20 A. Yes. Empire has complied with all of the Commission's rules, 4 CSR 240-3.161(5)
21 and (6), governing periodic reports and surveillance using the Commission's
22 electronic filing system and provided all of the parties to Case or File Nos. ER-
23 2008-0093, ER-2010-0130, ER-2011-0004, ER-2012-0345 and ER-2014-0351 with

1 copies of the periodic compliance reports and copies of surveillance reports at the
2 same time they were filed with the Commission.

3 **Q. IF FAC SHEET 17t IS APPROVED BY THE COMMISSION, WHAT**
4 **SAFEGUARDS EXIST TO ENSURE THAT THE FAC REVENUE**
5 **COLLECTED BY EMPIRE DOES NOT EXCEED THE ACTUAL TOTAL**
6 **ENERGY COST INCURRED BY EMPIRE DURING THE**
7 **ACCUMULATION PERIOD?**

8 A. As I mentioned earlier, Empire's FAC and the Commission's rules provide two
9 mechanisms designed to limit the FAC amounts collected from customers to
10 Empire's actual, prudently-incurred energy costs. First, at the end of each Recovery
11 Period the Company is required to true-up the amounts collected from customers
12 through the FAR with the total energy costs that were actually incurred during the
13 Accumulation Period to which the FAR applies. In addition, Empire's energy costs
14 will be subjected to periodic Prudence Reviews to ensure that only prudently-
15 incurred energy costs are collected from customers through the FAC. These two
16 mechanisms serve as checks that ensure that Empire's Missouri customers pay only
17 the prudently-incurred, actual cost of energy used to provide electric service in
18 Missouri (less the 5% Empire absorbs or retains) – no more and no less.

19 **Q. WHAT ACTION IS EMPIRE REQUESTING FROM THE COMMISSION**
20 **WITH RESPECT TO THE FAC RATE SCHEDULE THAT THE**
21 **COMPANY HAS FILED?**

22 A. As provided by 4 CSR 240-20.090(4), Staff has thirty (30) days from the date the
23 FAC rate schedule is filed to conduct a review and to make a recommendation to

1 the Commission as to whether the rate schedule complies with the Commission's
2 FAC rules, the requirements of Section 386.266, RSMo, and Empire's approved
3 FAC. The Commission has sixty (60) days from the date of Empire's filing to
4 either approve the rate schedule or to allow it to take effect by operation of law.
5 Empire believes its FAC filing satisfies all of the requirements of applicable
6 statutes, the Commission's rules, and Empire's approved FAC. Empire requests
7 that, following Staff's review, the Commission approve revised FAC sheet 17t to
8 be effective as of June 1, 2016, which is the first day of the Recovery Period
9 prescribed in Empire's FAC tariff.

10 **Q. IS EMPIRE REQUESTING ANY OTHER CHANGES TO THE FAC**
11 **TARIFF AT THIS TIME?**

12 A. No other changes to the FAC tariff sheets are being requested at this time.

13 **Q. DOES THIS CONCLUDE YOUR TESTIMONY AT THIS TIME?**

14 A. Yes, it does.

Cases with Filed Written Testimony of Todd W. Tarter

Before the Missouri Public Service Commission

- Rate Cases

ER-2006-0315, ER-2008-0093, ER-2010-0130, ER-2011-0004, ER-2012-0345, ER-2014-0351,

ER-2016-0023

- Fuel Adjustment Cases

ER-2011-0320, ER-2012-0098, ER-2012-0326, ER-2013-0122, ER-2013-0442, ER-2014-0087, ER-2014-0264, ER-2015-0085, ER-2015-0247, ER-2016-0080

- Fuel Adjustment True-Up

EO-2014-0088, EO-2014-0265, EO-2015-0086, EO-2015-0248, ER-2016-0082

Before the Kansas Corporation Commission

- Rate Docket

05-EPDE-980-RTS

- Energy Cost Adjustment ACA Docket

KS-12-EPDE-392-ACA, KS-13-EPDE-385-ACA, KS-14-EPDE-270-ACA, KS-15-EPDE-228-ACA,

KS-16-EPDE-260-ACA

Before the Oklahoma Corporation Commission

- Rate Cause

PUD 201100082

- Fuel Prudence Review Causes

PUD 201100131, PUD 201200170, PUD 201300131, PUD201400226, PUD201500265

- Energy Efficiency Cause

PUD 201300142, PUD 201300203

Before the Arkansas Public Service Commission

- Energy Efficiency Docket

07-076-TF

- Net Metering Docket

12-060-R

- Rate Docket

13-11-U

THE EMPIRE DISTRICT ELECTRIC COMPANY

P.S.C. Mo. No. 5 Sec. 4 2nd Revised Sheet No. 17t

Canceling P.S.C. Mo. No. 5 Sec. 4 1st Revised Sheet No. 17t

For ALL TERRITORY

FUEL & PURCHASE POWER ADJUSTMENT CLAUSE
RIDER FAC
For service on and after July 26, 2015

	Accumulation Period Ending		Feb 29, 2016
1	Total Energy Cost (TEC) = (FC + PP + E – OSSR - REC)		63,582,057
2	Net Base Energy Cost (B)	-	68,751,492
	2.1 Base Factor (BF)		0.02684
	2.2 Accumulation Period NSI (SAP)		2,561,531,000
3	(TEC-B)		(5,169,435)
4	Missouri Energy Ratio (J)	*	82.33%
5	(TEC - B) * J		(4,256,020)
6	Fuel Cost Recovery	*	95.00%
7	(TEC - B) * J * 0.95		(4,043,219)
8	True-Up Amount (T)	+	(225,112)
9	Prudence Adjustment Amount (P)	+	
10	Interest (I)	+	(18,473)
11	Fuel and Purchased Power Adjustment (FPA)	=	(4,286,804)
12	Forecasted Missouri NSI (SRP)	÷	2,196,228,827
13	Current Period Fuel Adjustment Rate (FAR) to be applied Beginning Jun 01, 2016	=	(0.00195)
14	Current Period FAR _{PRIM} = FAR x VAF _{PRIM}		(0.00204)
15	Current Period FAR _{SEC} = FAR x VAF _{SEC}		(0.00207)
16	VAF _{PRIM} = 1.0466		1.0466
17	VAF _{SEC} = 1.0622		1.0622

The Empire District Electric Company
Fuel Adjustment Clause
Cost Adjustment Factor Calculation
For Accumulation Period Ending Feb 2016

		Accumulation Period							Total
		Sept 15	Oct 15	Nov 15	Dec 15	Jan 16	Feb 16	Prior Period Adj	
Generation	[FC]	\$ 10,069,768.56	\$ 6,070,379.67	\$ 9,603,801.42	\$ 10,268,293.18	\$ 10,431,551.26	\$ 8,383,689.63		\$ 54,827,483.72
Fuel - AQCS	[FC]	\$ 224,269.91	\$ 124,228.22	\$ 129,230.21	\$ 314,864.43	\$ 251,290.86	\$ 187,765.03		\$ 1,231,648.66
Native Load Cost	[PP]	\$ 10,143,870.88	\$ 7,736,921.26	\$ 7,463,300.36	\$ 7,833,999.06	\$ 10,420,686.44	\$ 7,253,820.59		\$ 50,852,598.59
Transmission Costs	[PP]	\$ 460,288.56	\$ 471,305.57	\$ 436,569.56	\$ 485,797.78	\$ 440,931.21	\$ 474,571.86		\$ 2,769,464.54
Net of Emission Allow.	[E]	\$ -				\$ -			\$ -
EDE Sales	[OSSR]	\$ (9,975,858.62)	\$ (5,960,384.32)	\$ (7,624,164.83)	\$ (7,278,274.23)	\$ (8,909,479.84)	\$ (6,253,843.64)		\$ (46,002,005.48)
Renewable Energy Credit Revenues	[REC]	\$ -	\$ (4,024.24)	\$ (93,108.76)	\$ -	\$ -	\$ -		\$ (97,133.00)
Total Energy Cost		\$ 10,922,339.29	\$ 8,438,426.16	\$ 9,915,627.96	\$ 11,624,680.22	\$ 12,634,979.93	\$ 10,046,003.47		\$ 63,582,057.03
Net Base Energy Rate		\$ 0.02684	\$ 0.02684	\$ 0.02684	\$ 0.02684	\$ 0.02684	\$ 0.02684		
NSI kwh		435,890,000	371,225,000	387,045,000	439,693,000	509,962,000	417,716,000		2,561,531,000
Base Energy Cost	(B)	\$ 11,699,287.60	\$ 9,963,679.00	\$ 10,388,287.80	\$ 11,801,360.12	\$ 13,687,380.08	\$ 11,211,497.44		\$ 68,751,492.04
Missouri Retail kwh Sales		333,030,536	283,130,653	297,666,943	341,058,632	396,081,151	325,838,376		1,976,806,291
Total System kwh Sales		407,476,663	347,875,263	362,197,431	411,959,182	476,505,155	391,460,902		2,397,474,596
Missouri Energy Ratio	(J)	0.8173	0.8139	0.8218	0.8279	0.8312	0.8324		
Fuel & PP Cost Recovery (Over)/Under (((FC + PP + E - OSSR - REC - B) * J) * 0.95)		\$ (603,249.86)	\$ (1,179,333.11)	\$ (369,010.26)	\$ (138,959.63)	\$ (831,017.26)	\$ (921,649.32)		\$ (4,043,219.44)
(Over)/Under Adjustment	(T)							\$ (225,111.99)	\$ (225,111.99)
Interest (Expense)/Income	(I)	\$ (1,730.89)	\$ (2,295.49)	\$ (2,263.06)	\$ (3,598.52)	\$ (4,229.06)	\$ (4,355.99)		\$ (18,473.01)
Fuel & Purchased Power Adjustment (((FC + PP + E - OSSR - REC - B) * J) * 0.95) + T + I + P	(FPA)	\$ (604,980.75)	\$ (1,181,628.60)	\$ (371,273.32)	\$ (142,558.15)	\$ (835,246.32)	\$ (926,005.31)	\$ (225,111.99)	\$ (4,286,804.44)
For Recovery Period									
Forecasted NSI kwh	a								2,654,284,476
Forecasted Missouri Retail kwh Sales	b								2,052,953,747
Forecasted Total System kwh Sales	c								2,481,127,282
Forecasted Missouri Ratio									82.74%
Forecasted Missouri NSI kwh (S)=a*(b/c)	(S)								2,196,228,827
Cost Adjustment Factor (FAR=FPA./S)	(FAR)								-0.00195
FAR - Primary and above									-0.00204
Primary Expansion Factor		1.0466							
FAR - Secondary									-0.00207
Secondary Expansion Factor		1.0622							

AFFIDAVIT OF TODD W. TARTER

STATE OF MISSOURI)
) ss
COUNTY OF JASPER)

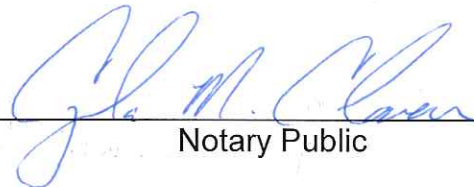
On the 1st day of April, 2016, before me appeared Todd W. Tarter, to me personally known, who, being by me first duly sworn, states that he is Manager of Strategic Planning of The Empire District Electric Company and acknowledges that he has read the above and foregoing document and believes that the statements therein are true and correct to the best of his information, knowledge and belief.



Todd W. Tarter

Subscribed and sworn to before me this 1st day of April, 2016.

ANGELA M. CLOVEN
Notary Public - Notary Seal
State of Missouri
Commissioned for Jasper County
My Commission Expires: November 01, 2019
Commission Number: 15262659



Notary Public

My commission expires: 11/01/2019.