

November 4, 2019

VIA ELECTRONIC FILING

Mr. Morris Woodruff, Secretary
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

RE: The Empire District Gas Company

Dear Judge Woodruff:

To reflect the proper change in the Purchased Gas Adjustment (“PGA”), Actual Cost Adjustment (“ACA”), and Refund Factor of The Empire District Gas Company (“EDG”), I am providing herewith to the Missouri Public Service Commission for filing, in electronic form, the following revised tariff sheets:

P.S.C. MO. No. 2, 15th Revised Sheet No. 62

P.S.C. MO. No. 2, 15th Revised Sheet No. 63

P.S.C. MO. No. 2, 15th Revised Sheet No. 65

Purchased Gas Adjustment

Enclosures 1, 2, and 3 reflect the PGA calculations for EDG’s South, North and Northwest local distribution systems. Each PGA gas cost calculation has been developed using a NYMEX index price, fixed or hedged gas cost, and storage gas cost for the months of November, 2019 through October, 2020. The proposed rate changes are also based upon the current interstate pipeline transportation rates authorized by the Federal Energy Regulatory Commission (“FERC”) for each of the interstate pipelines transporting natural gas to each of EDG’s three local distribution systems. The pipeline transportation charges included in this request for the South system are based upon the Southern Star Central Gas Pipeline (“SSCP”) tariffs. The transportation charges for the North System are based on the Panhandle Eastern Pipe Line Company Gas tariffs. The transportation charges for Northwest System are based on the ANR Gas tariffs. Information concerning the specific charges and the applicable pipeline tariff sheets is displayed on Enclosures 1, 2 and 3 of the supporting schedules.

Actual Cost Adjustment

Included as Enclosure 4 to this filing are the schedules that support the ACA portion of this filing. Schedule 4 of Enclosure 4 is a summary showing revenue, purchased gas costs, and over or under recovery for the ACA year ended August, 2019, and the proposed changes in the ACA rates to be effective December 4, 2019. Detailed supporting workpapers will also be made available to the Commission Staff.



The summary schedule shows that the purchased gas revenue recovery during the ACA year ended August 31, 2019, resulted in an over-recovery balance in the amount of \$1,052,606 for the South system (Firm customers), an over-recovery balance in the amount of \$119,503 for the North system (Firm customers) and an under-recovery balance in the amount of \$102,535 for the Northwest system (Firm customers). In total the gas cost recovery for the three systems combined was an over-recovery balance in the amount of \$1,069,574 for the ACA year ended August 31, 2019.

Carrying Cost

The EDG PGA in effect during the current ACA year included a provision for the calculation of carrying costs on any deferred balances. The carrying cost calculation for each system has been displayed on Enclosure 5.

Revenue Change

Enclosures 6, 7, and 8 reflect the winter season revenue change associated with the residential gas cost recovery portion of the rates. These enclosures compare the PGA rates included in this filing to the PGA rates in effect during the winter season last year. The overall PGA rates for the South, North, and Northwest system will decrease from where they were last winter. Specifically, the proposed total PGA change results in an decrease in PGA charges from those that are currently in effect with an overall residential winter PGA revenue decrease of \$1,008,349 or 18.92% for the South system, an overall residential winter PGA revenue decrease of \$490,605 or 23.72% for the North system, and an overall residential winter PGA revenue increase of \$33,219 or 3.51% for the Northwest system. In addition, a residential customer consuming 600 Ccf of natural gas over the upcoming winter season of November through March, should see an decrease in natural gas costs of almost \$45 on the South system, and a decrease of around \$64 on the North system and an increase of \$7 on the Northwest system. A more detailed analysis of the overall change in PGA rates is displayed on Enclosure 9. The overall change in the PGA rates has been subdivided into three components:

Interstate Pipeline Transportation
Natural Gas Cost
Actual Cost Adjustment (ACA)

The overall PGA rates on the Northwest system remain the lowest of the three systems that EDG operates. This is primarily due to the lower interstate pipeline transportation cost associated with service on the Northwest system. The average interstate transportation rates on the South and North system range from \$.16 to \$.17 per Ccf, while those on the Northwest average close to \$0.12 per Ccf.

Hedging Activity

EDG's plans call for a combination of storage and financial instruments to fix the cost of



natural gas acquisition for the upcoming winter season for each of the three systems as follows:

South	60 percent
North	80 percent
Northwest	85 percent

Effective Date

EDG respectfully requests that these PGA rates become effective with volumes used on and after December 4, 2019.

Please bring this filing to the attention of the Commissioners and the appropriate Commission personnel.

Sincerely,

Diana Carter