

August 14, 2019

***VIA ELECTRONIC FILING***

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

**RE: The Empire District Electric Company (“Liberty-Empire”)  
General Rate Case Filing – Case No. ER-2019-0374**

Dear Judge Woodruff:

On behalf of Liberty-Empire, I am providing herewith to the Missouri Public Service Commission (the “Commission”) for filing, in electronic form, certain tariff sheets consisting of revised rate schedules which are designed to increase Liberty-Empire’s gross annual electric revenues by approximately \$26.5 million, exclusive of applicable gross receipts, sales, franchise, or occupational fees or taxes.

The electric rate schedules being filed are all part of "Schedule of Rates for Electricity" designated P.S.C. No. 5. The specific schedules being submitted are shown on the attached. All of these schedules bear a date of issue of August 14, 2019, and an effective date thirty days thereafter (September 13, 2019).

In accordance with Commission Rule 4 CSR 240-2.065(1), also being provided in electronic form are the verified direct testimonies and schedules of Liberty-Empire witnesses Sheri Richard, Brent Baker, Jill Schwartz, Leigha Palumbo, Samuel S. McGarrah, Nathaniel W. Hackney, Timothy N. Wilson, Jeffrey Westfall, Aaron J. Doll, Todd W. Tarter, Dale Harrington, Eric Fox, James A. Fallert, Robert B. Hevert, and Timothy S. Lyons.

As set forth in the Notice of Intended Case Filing submitted on May 29, 2019, pursuant to RSMo. 386.266.4(3), Liberty-Empire was required to file a general rate case with the effective date of new rates to be no later than four years after September 9, 2016. The dominant factors driving the amount of the rate increase requested in this proceeding are: (1) investments in Liberty-Empire’s transmission and distribution systems since April 1, 2016; (2) increased costs for property taxes and depreciation expense stemming from additional capital investment; and (3) normal and inflationary increases in operating costs.

The remaining information required by Commission Rule 4 CSR 240-3.030(3)(B) is being filed herein as part of the Direct Testimony of Liberty-Empire witness Sheri Richard (Schedule SDR-9). Ms. Richard’s Direct Testimony satisfies the following minimum filing requirements of Rule 3.030(3)(B):

1. the amount of dollars of the aggregate annual increase and percentage of increase over current revenues;
2. names of counties and communities affected;
3. the number of customers to be affected in each general category of service and for all rate classifications within each general category of service;
4. the average change requested in dollars and percentage change from current rates for each general category of service and for all rate classifications;
5. the proposed annual aggregate change by general categories of service and by rate classifications, including dollar amounts and percentage change in revenues;
6. any press releases relative to the filing; and
7. a summary of the reasons for the proposed schedule changes.

Also being filed herein is an Application for Variance regarding certain heat rate testing required by Commission Rule 4 CSR 240-20.090 (the FAC minimum filing requirements).

Please note that portions of these general rate case filings have been designated as Confidential in accordance with Commission Rule 4 CSR 240-2.135(2)(A) and Highly Confidential in accordance with Commission Rule 4 CSR 240-2.135(4). A motion for a protective order regarding the Highly Confidential material has been filed.

Please do not hesitate to contact me with any questions or concerns, and please bring these filings to the attention of the Commissioners and the appropriate Commission personnel.

Sincerely,

*Diana Carter*

<b>Section</b>	<b>Sheet No.</b>	<b>Schedule</b>	<b>Designated</b>	<b>Canceling</b>	<b>Issued</b>
A	1	Table of Contents	29 <sup>th</sup>	28 <sup>th</sup>	7/7/2015
1	1	Residential Service Schedule RG	20 <sup>th</sup>	19 <sup>th</sup>	8/15/2015
1	1a	Residential Service Schedule RG	1 <sup>st</sup>	Original	8/28/2018
2	1	Commercial Service Schedule CB	19 <sup>th</sup>	18 <sup>th</sup>	8/15/2016
2	1b	Commercial Service Schedule CB	1 <sup>st</sup>	Original	8/28/2018
2	2	Small Heating Service Schedule SH	19 <sup>th</sup>	18 <sup>th</sup>	8/15/2016
2	2b	Small Heating Service Schedule SH	1 <sup>st</sup>	Original	8/28/2018
2	3	General Power Service Schedule GP	19 <sup>th</sup>	18 <sup>th</sup>	8/15/2016
2	3b	General Power Service Schedule GP	1 <sup>st</sup>	Original	8/28/2018
2	4	Large Power Service Schedule LP	20 <sup>th</sup>	19 <sup>th</sup>	8/15/2016
2	4b	Large Power Service Schedule LP	1 <sup>st</sup>	Original	8/28/2018
2	6	Feed Mill and Grain Elevator Schedule PFM	19 <sup>th</sup>	18 <sup>th</sup>	8/15/2016
2	6a	Feed Mill and Grain Elevator Schedule PFM	1 <sup>st</sup>	Original	8/28/2018
2	7	Total Electric Building Service Schedule TEB	19 <sup>th</sup>	18 <sup>th</sup>	8/15/2016
2	7b	Total Electric Building Service Schedule TEB	1 <sup>st</sup>	Original	8/28/2018
2	9	Special Transmission Service Contract Praxair Schedule SC-P	15 <sup>th</sup>	14 <sup>th</sup>	8/15/2016
2	9c	Special Transmission Service Contract Praxair Schedule SC-P	1 <sup>st</sup>	Original	8/28/2018
2	13	Special Transmission Service Schedule ST	14 <sup>th</sup>	13 <sup>th</sup>	8/15/2016
2	14a	Special Transmission Service Schedule ST	6 <sup>th</sup>	5 <sup>th</sup>	8/28/2018
3	1	Municipal Street Lighting Schedule SPL	18 <sup>th</sup>	17 <sup>th</sup>	2/28/2013
3	1a.1	Municipal Street Lighting Schedule SPL	1 <sup>st</sup>	Original	8/28/2018
3	2	Private Lighting Service Schedule PL	22 <sup>nd</sup>	21 <sup>st</sup>	2/28/2013
3	2b	Private Lighting Service Schedule PL	1 <sup>st</sup>	Original	8/28/2018
3	3	Special Lighting Service Schedule LS	17 <sup>th</sup>	16 <sup>th</sup>	2/28/2013
3	3b	Special Lighting Service Schedule LS	1 <sup>st</sup>	Original	8/28/2018
3	4	Miscellaneous Service Schedule MS	17 <sup>th</sup>	16 <sup>th</sup>	2/28/2013
3	4a	Miscellaneous Service Schedule MS	1 <sup>st</sup>	Original	8/28/2018
4	17u	Fuel & Purchased Power Adjustment Clause Rider FAC	1 <sup>st</sup>	Original	8/15/2016
4	17v	Fuel & Purchased Power Adjustment Clause Rider FAC	1 <sup>st</sup>	Original	8/15/2016

<b>Section</b>	<b>Sheet No.</b>	<b>Schedule</b>	<b>Designated</b>	<b>Canceling</b>	<b>Issued</b>
4	17w	Fuel & Purchased Power Adjustment Clause Rider FAC	1 <sup>st</sup>	Original	8/15/2016
4	17x	Fuel & Purchased Power Adjustment Clause Rider FAC	1 <sup>st</sup>	Original	8/15/2016
4	17y	Fuel & Purchased Power Adjustment Clause Rider FAC	1 <sup>st</sup>	Original	8/15/2016
4	17z	Fuel & Purchased Power Adjustment Clause Rider FAC	1 <sup>st</sup>	Original	8/15/2016
4	17aa	Fuel & Purchased Power Adjustment Clause Rider FAC	1 <sup>st</sup>	Original	8/15/2016
4	17ab	Fuel & Purchased Power Adjustment Clause Rider FAC	1 <sup>st</sup>	Original	8/15/2016
4	17ac	Fuel & Purchased Power Adjustment Clause Rider FAC	7 <sup>th</sup>	6 <sup>th</sup>	8/15/2016
4	24	Low Income Pilot Program	1 <sup>st</sup>	Original	12/1/2016
4	25	Weather Normalization Rider WNR	Original		
4	25a	Weather Normalization Rider WNR	Original		
4	25b	Weather Normalization Rider WNR	Original		
4	25c	Weather Normalization Rider WNR	Original		
4	25d	Weather Normalization Rider WNR	Original		