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July 31, 2014

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

**RE: LED Street Lighting Pilot / Tariff Tracking No. JE-2015-0004  
The Empire District Electric Company**

Dear Judge Woodruff:

On July 10, 2014, The Empire District Electric Company filed the following original tariff sheets with the Missouri Public Service Commission:

P.S.C. Mo. No. 5, Sec. 3, Original Sheet No. 1b  
P.S.C. Mo. No. 5, Sec. 3, Original Sheet No. 1c

Those sheets bear a proposed effective date of August 9, 2014, and were submitted in follow-up to the resolution of MoPSC Case No. ER-2012-0345. At the request of the Commission Staff, Empire is filing a "substitute" tariff sheet for P.S.C. Mo. No. 5, Sec. 3, Original Sheet No. 1c. The only change to the sheet is the addition of the word potentially:

All costs associated with the pilot study will be tracked to **potentially** facilitate the development of a permanent LED SL tariff at the conclusion of the pilot study.

Please bring this "substitute" tariff filing to the attention of the Commissioners and the appropriate Commission personnel, and please do not hesitate to contact me with any questions or concerns.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:   
Diana C. Carter

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**RE: LED Street Lighting Pilot  
The Empire District Electric Company**

Dear Judge Woodruff:

The Empire District Electric Company is filing with the Missouri Public Service Commission the following original tariff sheets:

P.S.C. Mo. No. 5, Sec. 3, Original Sheet No. 1b  
P.S.C. Mo. No. 5, Sec. 3, Original Sheet No. 1c

These tariff sheets are dated today, July 10, 2014, and bear a proposed effective date thirty days thereafter – August 9, 2014.

This tariff filing is in follow-up to the resolution of MoPSC Case No. ER-2012-0345. As part of the resolution of that case, Empire agreed to “either file LED street and area lighting (SAL) tariff sheets or make an informational filing with the Commission to provide an update on an LED pilot study and plans for filing future LED SAL tariff sheets” by April 1 of 2014.

Empire established a working group of its employees to study and discuss LED SAL issues. The working group recommended to Empire’s management that Empire propose to the Commission an LED street light pilot study to gather financial and statistical information associated with the installation and operation of LED street lights based upon Empire-specific information, and Empire management agreed with that recommendation.

Empire, however, did not submit tariff sheets by April 1, and, instead, filed a Notice Regarding LED Street and Area Lighting in Case No. ER-2012-0345. Empire then discussed its pilot approach with representatives for the Staff of the Commission and the Office of the Public Counsel and worked with Staff representatives on tariff language.

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July 10, 2014

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

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:   
Diana C. Carter

For ALL TERRITORY

LED STREET LIGHTING PILOT
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**PROGRAM GOALS**

The LED pilot study’s primary goals are:

- Determine the overall suitability and feasibility of offering LED street lighting as an option,
- determine community and municipal acceptance of LED street lighting,
- establish serviceability and maintenance costs associated with the LED lights
  - validation of mortality rates of the LED fixtures,
  - verify the manufacturer’s projected energy usage, and
- facilitate the determination of permanent LED SAL lighting rates based upon the financial and operating characteristics gathered during the duration of the LED pilot study.

**PROGRAM PARAMETERS**

- The program shall be limited to up to five (5) locations in up to five (5) different cities or municipalities within Empire’s Missouri service territory currently taking street lighting service from Empire.
  - Empire will select the location of each LED street light installation in consultation with the municipality involved.
  - The individual LED street light locations selected will consist of two blocks of continuous roadway preferably connecting areas of principal traffic generation within a city or be important rural roadway into a city.
- The LED pilot study will have a term of three years to facilitate the tracking of financial and mortality statistics over an extended period.
- LED lights installed as part of the study will replace existing luminaires on existing lighting standards or be provided for completely new street light installations in place of the existing standards for new street light installations.
- LED fixtures installed as part of the pilot study are limited to 150 and/or 250 W HPS equivalence.
- LED fixtures installed during the pilot study that fail may be replaced with standard fixtures available under the Company’s existing street light tariffs if the existing LED fixture is no longer available or is determined by the Company to not meet the evaluation criteria for the pilot.

THE EMPIRE DISTRICT ELECTRIC COMPANY

P.S.C. Mo. No. 5 Sec. 3 Original Sheet No. 1c

Canceling P.S.C. Mo. No. \_\_\_\_\_ Sec. \_\_\_\_\_ Original Sheet No. \_\_\_\_\_

For ALL TERRITORY

LED STREET LIGHTING PILOT
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- The rates charged for the LED lights installed during the duration of the LED pilot study shall be identical to the rates charged for the street lighting fixtures replaced by the LED fixtures during the pilot. The rates charged for the LED lights installed during the duration of the LED pilot study shall be the currently effective rates set forth in P.S.C. Mo. No. 5, Section 3, Sheet No. 1, which rates are subject to change from time to time pursuant to the authorization of the Missouri Public Service Commission.
- Pilot program costs to be tracked:
  - All costs associated with the pilot study will be tracked to potentially facilitate the development of a permanent LED SL tariff at the conclusion of the pilot study. Among the costs to be tracked include, but are not limited to the following: installed cost, depreciation assuming a twenty-year LED fixture life, maintenance costs and energy costs, which will be metered.
- After two years of operation, the Company will evaluate the results at the pilot location(s) and report the results to the Missouri Public Service Commission.