



May 28, 2021

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
General Rate Case Filing – Case No. ER-2021-0312**

Dear Judge Woodruff:

I am providing to the Commission for filing, in electronic form, certain tariff sheets consisting of revised rate schedules which are designed, in total, to increase Empire's gross annual electric revenues by approximately \$79.9 million, exclusive of applicable gross receipts, sales, franchise, or occupational fees or taxes. The specific schedules being submitted are shown on the attached. All of these schedules bear a date of issue of May 28, 2021, and an effective date thirty days thereafter.

The traditional portion of Empire's request involves a revenue requirement increase of approximately \$50.0 million, or 7.61 percent over current rates. The proposed rates reflect Empire's efforts to better serve customers through a transition to clean, less expensive renewable energy and investments to strengthen and modernize our infrastructure and systems.

Empire, with the approval of the Commission, is taking steps to lessen the impact of Winter Storm Uri on its Missouri customers. With the inclusion of the impact of Winter Storm Uri in this rate case proceeding, there is an additional revenue requirement increase of approximately \$29.9 million, or 4.54 percent. Empire, however, plans to seek securitization of the Winter Storm Uri costs, if that becomes a possibility under new legislation during the pendency of this case.

In accordance with Commission Rule 20 CSR 4240-2.065(1), also being provided in electronic form are the verified direct testimonies and schedules of the following Empire witnesses:

Witness	Topics
Tim Wilson, Vice President of Electric Operations	Policy, Summary of Rate Changes, Introduction of Witnesses
Tisha Sanderson, Vice President of Finance and Administration, Empire	MPPM, Revenue Requirements – Wind, Asbury, and AMI
Todd Mooney, Vice President of Finance and Administration, Liberty Utilities (Canada) Corp.	Purchase of Wind Holdcos, Capital Structure, Affiliate Issues

Charlotte T. Emery, Senior Manager of Rates and Regulatory Affairs	Revenue Requirement – Other, PISA
Zachary Quintero, Senior Analyst of Rates and Regulatory Affairs	General Rate Case and FAC Minimum Filing Requirements
Gregory W. Tillman, Senior Manager of Rates and Regulatory Affairs	Revenue Adjustments, Misc. Tariff Changes, Time of Use Rates
Jon Harrison, Director of Customer Experience	Customer Experience, Limited-Income Assistance
Aaron J. Doll, Senior Director of Energy Strategy	Wind - MPPM, Affiliate Waivers, Impact on FAC; FAC Rider; Decision to Retire Asbury
Shaen T. Rooney, Senior Manager of Strategic Projects	Wind Projects, Other Capital Projects
Jeffery Westfall, Central Region Director of Electric Operation – Transmission & Distribution	Transmission and Distribution System Investment
Chad C. Hook, Regional Director of Operations Strategy	AMI, Project Guardian
Drew W. Landoll, Director of Strategic Projects	Decommissioning Plan for Asbury, Creation of Asbury Renewable Operations Center
Todd W. Tarter, Senior Manager of Strategic Planning	FAC
Jill Schwartz, Director of Regulatory for Shared Services	CAM, Affiliate Allocations
Nathaniel W. Hackney, Senior Reporting and Systems Analyst	Energy Efficiency
Frank C. Graves	Economic and Regulatory Policies Supporting Recovery of the Remaining Investment in Asbury
Eric Fox	Weather Normalization Study
John J. Reed	Return on Equity, Reasonableness of Capital Structure
Timothy S. Lyons	Lead Lag Study, CCOS, Rate Design
Dane A. Watson	Depreciation Study
James A. Fallert	Pension/OPEB

Principal among Empire’s reasons for filing this case is to bring forward our pivot toward a cleaner, lower cost, and modernized future centered on wind generation. In addition to the integration of 600 MW of new wind generation, the Company also decommissioned its Asbury coal plant, which was becoming increasingly uneconomic in the Southwest Power Pool, and brought online its first Community Solar facility. The Company is also seeking to recover costs related to the rollout of AMI and, at this time, the financial impact of Winter Storm Uri.

The remaining information required by Commission Rule 20 CSR 4240-3.030(3)(B) is being filed herein as part of the Direct Testimonies of Empire witness Charlotte Emery and Zachary Quintero, including:

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.

Please note that portions of this general rate case filing have been designated as Confidential in accordance with Commission Rule 20 CSR 4240-2.135(2)(A) and Highly Confidential in accordance with Commission Rule 20 CSR 4240-2.135(4) and the protective order issued by the Commission.

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

Enclosures

cc: Dean Cooper
The Office of the Public Counsel
Counsel for the Staff of the Commission

Revised and New Tariffs

MO	PSC MO NO 6	SEC A	SHEET 1	TOC
MO	PSC MO NO 6	SEC 1	SHEET 1	RG
MO	PSC MO NO 6	SEC 1	SHEET 1a	RGT
MO	PSC MO NO 6	SEC 2	SHEET 1	CB
MO	PSC MO NO 6	SEC 2	SHEET 1b	CBT
MO	PSC MO NO 6	SEC 2	SHEET 2	SH
MO	PSC MO NO 6	SEC 2	SHEET 3	GP
MO	PSC MO NO 6	SEC 2	SHEET 4	LP
MO	PSC MO NO 6	SEC 2	SHEET 4A	LPT
MO	PSC MO NO 6	SEC 2	SHEET 6	PFM
MO	PSC MO NO 6	SEC 2	SHEET 7	TEB
MO	PSC MO NO 6	SEC 2	SHEET 9	RESERVED
MO	PSC MO NO 6	SEC 2	SHEET 9A	RESERVED
MO	PSC MO NO 6	SEC 2	SHEET 9B	RESERVED
MO	PSC MO NO 6	SEC 2	SHEET 13	RESERVED
MO	PSC MO NO 6	SEC 2	SHEET 14	RESERVED
MO	PSC MO NO 6	SEC 3	SHEET 1	SPL
MO	PSC MO NO 6	SEC 3	SHEET 2	PL
MO	PSC MO NO 6	SEC 3	SHEET 3	LS
MO	PSC MO NO 6	SEC 3	SHEET 4	MS
MO	PSC MO NO 6	SEC 3	SHEET 6	LED
MO	PSC MO NO 6	SEC 4	SHEET 18	OTOU
MO	PSC MO NO 6	SEC 4	SHEER 25	TS
MO	PSC MO NO 6	SEC 4	SHEER 26	REP