



October 7, 2021

***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 d/b/a Liberty (“EDG” or the “Company”)  
Tracking No. JG-2022-0059; Case No. GT-2022-0080

Dear Judge Woodruff:

On September 16, 2021, EDG initiated a “GT” case and submitted revised tariff sheets designed to narrowly amend EDG’s Rider PGA to allow flexibility to extend the Purchased Gas Adjustment (“PGA”) Actual Cost Adjustment (“ACA”) recovery period beyond 12 months, with a proposed effective date of October 22, 2021.

To address concerns that were raised by the Staff of the Commission, EDG is submitting substitute revised tariff sheets. The tariff language has been revised to clarify that an extended recovery period would only be for under-recovery situations, to add Staff and OPC as parties that may request an extended recovery period, and to clarify the carrying cost request language. The specific sheets being filed are as follows:

|             |  |
|-------------|--|
| PSC MO No 2 | 1 <sup>st</sup> Revised Sheet No. 56 and |
| PSC MO No 2 | 1 <sup>st</sup> Revised Sheet No. 57.    |

As substitutes, these sheets continue to bear an issue date of September 16, 2021, and a requested effective date of October 22, 2021.

As noted with the initial filing, the requested tariff changes do not immediately impact rates or charges or the Company’s revenue requirement. Instead, the revisions will provide the possibility for EDG to defer certain costs that would otherwise be due in the near future under the Company’s current PGA/ACA tariff and potentially lengthen the recovery period for the fuel costs stemming from the extraordinary weather event that occurred in February of 2021. The specific recovery proposal will be made by the Company in the PGA/ACA submission to be filed by EDG between October 15 and November 4, 2021.

Please do not hesitate to contact me with any questions or concerns you may have regarding this substitute tariff filing.

Sincerely,

*Diana Carter*