

Exhibit No.: \_\_\_\_\_  
Issue: Storm Uri AAO Request  
Witness: Charlotte T. Emery  
Type of Exhibit: Surrebuttal Testimony  
Sponsoring Party: The Empire District  
Electric Company  
Case No.: EU-2021-0274  
Date Testimony Prepared: January 2022

**Before the Public Service Commission  
of the State of Missouri**

**Surrebuttal Testimony**

**of**

**Charlotte T. Emery**

**on behalf of**

**The Empire District Electric Company**

**January 2022**



TABLE OF CONTENTS  
FOR THE SURREBUTTAL TESTIMONY OF CHARLOTTE T. EMERY  
THE EMPIRE DISTRICT ELECTRIC COMPANY  
BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION  
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SUBJECT	PAGE
<b>I. INTRODUCTION.....</b>	<b>1</b>
<b>II. RESPONSE TO STAFF REBUTTAL TESTIMONY .....</b>	<b>3</b>
<b>III. RESPONSE TO OPC REBUTTAL TESTIMONY .....</b>	<b>11</b>

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THE EMPIRE DISTRICT ELECTRIC COMPANY  
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1 **I. INTRODUCTION**

2 **Q. Please state your name and business address.**

3 A. My name is Charlotte T. Emery. My business address is 602 South Joplin Avenue,  
4 Joplin, MO, 64802.

5 **Q. By whom are you employed and in what capacity?**

6 A. I am employed by Liberty Utilities Service Corp., as the Director of Rates and  
7 Regulatory Affairs for the Liberty Central Region, which includes The Empire District  
8 Electric Company (“Empire” or “Company”).

9 **Q. On whose behalf are you testifying in this proceeding?**

10 A. I am testifying on behalf of Empire.

11 **Q. Please describe your educational and professional background**

12 A. I graduated from College of the Ozarks, Point Lookout, Missouri, in 2000 with a  
13 Bachelor of Science degree with a major in Accounting. I have been a Certified Public  
14 Accountant (“CPA”) in the State of Missouri since 2006. I was hired by Empire in July  
15 2016 as a Rates Analyst and promoted to my current position as the Director, Rates and  
16 Regulatory Affairs in 2021.

17 Prior to joining the Company, I worked for six years in the regulated insurance  
18 industry in Springfield, Missouri as a Director of Accounting. In addition, I have nine  
19 years of public accounting experience working for both a national and “Big Four”  
20 accounting firms. My primary roles at these organizations included serving as a  
21 supervisor for financial statement audits and a tax consultant.

1 **Q. Have you previously testified before the Missouri Public Service Commission**  
2 **(“Commission”) or any other regulatory agency?**

3 A. Yes. I have testified on behalf of Empire before this Commission, as well as before the  
4 Kansas Corporation Commission, the Arkansas Public Service Commission, and the  
5 Oklahoma Corporation Commission. The case references are attached to this testimony  
6 as Surrebuttal Schedule CTE-1.

7 **Q. At this time, you are submitting Surrebuttal Testimony on behalf of Empire. Did**  
8 **you previously submit Direct Testimony in this proceeding?**

9 A. No. Pursuant to the procedural schedule, the Company did not submit pre-filed Direct  
10 Testimony. Instead, Empire’s Verified Winter Storm Uri AAO Application filed herein  
11 on June 2, 2021 (EFIS Doc. No. 7) (the “Application”) served as the Company’s Direct  
12 Testimony. To the extent required for evidentiary purposes, that filing is incorporated  
13 herein by reference.

14 **Q. What is the purpose of your Surrebuttal Testimony in this proceeding?**

15 A. My Surrebuttal Testimony serves to briefly summarize the Company’s request to track  
16 and defer a regulatory asset associated with Winter Storm Uri, as set forth in the  
17 Company’s Application. In addition, I address the Rebuttal Testimony of Commission  
18 Staff (“Staff”) witness Kimberly K. Bolin and Office of the Public Counsel (“OPC”)   
19 witness Dr. Geoff Marke regarding the Company’s request.

20 **Q. Did any parties other than Staff or OPC submit Rebuttal Testimony in this**  
21 **matter.**

22 A. No.

1 **II. RESPONSE TO STAFF REBUTTAL TESTIMONY**

2 **Q. Do you agree with Ms. Bolin’s summary of Empire’s Accounting Authority Order**  
3 **(“AAO”) request in respect to Winter Storm Uri, as outlined in her Rebuttal**  
4 **Testimony starting on page 3?**

5 A. Yes. With the Application, Empire seeks authorization to accrue in a regulatory asset  
6 certain extraordinary costs it incurred during Winter Storm Uri. Specifically, the costs  
7 include (1) the remaining amount of Winter Storm Uri fuel and purchased power costs  
8 that Empire prudently incurred that were not initially eligible to be included in the fuel  
9 adjustment clause (“FAC”) (the 5%), (2) carrying charges associated with all fuel and  
10 purchased power costs for this period, and (3) other costs specifically related to Winter  
11 Storm Uri, including outside legal fees.

12 **Q. Do you agree with Ms. Bolin’s assertion on page 5 of her Rebuttal Testimony that**  
13 **Storm Uri costs meet the definition of “extraordinary”?**

14 A. Yes. Because these costs were unexpected and were the result of an unusual event.  
15 Therefore, the Company utilized the Federal Energy Regulatory Commission’s  
16 Uniform System of Accounts (“USOA”), which Empire is required to follow under  
17 Commission Rule 20 CSR 4240-20.030. General Instruction 7 of the USOA states that  
18 “extraordinary items” relating to the “effects of events...which have occurred during  
19 the current period and which are unusual in nature and infrequent occurrence shall be  
20 considered extraordinary items.” These events must be “of significant effect which are  
21 abnormal and significantly different from the ordinary and typical activities of the  
22 Company, and which would not reasonably be expected to recur in the foreseeable  
23 future.”

1 **Q. Does the Company believe that Winter Storm Uri is significantly different from**  
2 **its ordinary and typical activities?**

3 A. Yes.

4 **Q. Is there any indication that the Commission would also designate Winter Storm**  
5 **Uri as being an unusual and a non-typical activity?**

6 A. Yes. On February 24, 2021, the Commission issued an order directing Staff to  
7 investigate and submit a report noting, much of the Midwest, including Missouri,  
8 experienced unseasonably cold temperatures in February 2021. Such temperatures  
9 resulted in rolling electrical blackouts and extreme natural gas price spikes in Missouri.  
10 In its Investigation Order, the Commission directed its Regulatory Analysis and  
11 Customer Experience Departments, with assistance from its Industry Analysis and  
12 Financial Analysis Divisions, to investigate Missouri's electric and natural gas utilities'  
13 preparation for and response to Missouri February 2021 extreme cold and to report  
14 their findings to the Commission. The Commission Staff did comply with the  
15 Commission Order Empire data was specifically filed in case number EO-2021-0361.

16 **Q. As of October, 2021, what is the amount the Company seeks to defer associated**  
17 **with this AAO request?**

18 A. The balance of the deferral at the end of October 2021 is \$10,699,573, including  
19 \$10,124,475 in unrecovered fuel and purchased power costs, \$440,705 in carrying  
20 costs, and \$134,393 in legal fees.

21 **Q. Do you anticipate this balance changing?**

22 A. Yes, I would expect the balance to get updated to reflect additional costs associated  
23 with the various components the Company has requested to include in the deferral such

1 as additional storm costs, legal fees, carrying costs and any resettlement amounts on  
2 Winter Storm Uri balances.

3 **Q. How does the Company anticipate recovering these costs?**

4 A. Through securitization. Empire included the costs in the rate case it filed on May 28,  
5 2021, which was docketed ER-2021-0312 and is currently pending before the  
6 Commission. At that time, the Missouri legislature had approved the bill, and it  
7 subsequently passed into law in August 2021, as RSMo. §393.1700, allowing for the  
8 possibility of securitization. The Company plans to securitize the costs under that  
9 statute.

10 **Q. Has the Company officially removed the costs of Winter Storm Uri out of the rate  
11 case?**

12 A. It expects to shortly. On January 5, 2022, Empire notified the parties in that proceeding  
13 that it intends to officially remove all of the costs associated with Winter Storm Uri  
14 from its revenue request when it files its surrebuttal testimony.

15 **Q. Please summarize this section of your testimony in this matter.**

16 A. In this section of my testimony, I respond to Staff witness Ms. Bolin's recommendation  
17 that the Commission deny inclusion of carrying costs on its Winter Storm Uri expenses  
18 from the regulatory asset. In so doing, I explain that Ms. Bolin's claims that the  
19 Company's accounting practices are somehow binding on decisions the Commission  
20 may make in the future regarding the recovery of costs are incorrect and without  
21 support. I further explain why her recommendations regarding the inclusion of certain  
22 types of costs, but not others, in the deferral request contradict themselves in ways that  
23 is not fully clarified. I also respond to Ms. Bolin's recommendation that the  
24 Commission apply an adjustment to reduce the Company's revenues from February

1 2021 to offset some portion of the costs it incurred. Specifically, I explain my concerns  
2 that the assumptions Ms. Bolin makes regarding Empire’s profitability during this  
3 period are not supported, that she makes no specific recommendation for her proposed  
4 adjustment or how it should be calculated, and that the proposal appears to be  
5 retroactive, subjective, and without precedent in Missouri.

6 **Q. Does Staff witness Kimberly K. Bolin agree with the Company that Winter Storm  
7 Uri is an extraordinary event?**

8 A. As stated previously, yes.<sup>1</sup>

9 **Q. Does Staff agree that the Company should be allowed to defer the Storm Uri costs?**

10 A. In the Staff Recommendation filed in this matter, Staff recommended “that the  
11 Commission approve Empire’s request for an AAO, but that any ratemaking decisions,  
12 including the amount of recovery from customers and application of carrying costs, be  
13 determined in a future general rate or securitization proceeding.” Staff  
14 Recommendation, October 8, 2021, para. 2. In her Rebuttal Testimony, Ms. Bolin  
15 agrees with Empire’s request to defer its fuel and purchased power costs and its legal  
16 costs; however, she opposes deferral of the carrying costs.<sup>2</sup>

17 **Q. What reason does Ms. Bolin give for her opposition to the inclusion of the carrying  
18 costs in the regulatory asset?**

19 A. Ms. Bolin contends that doing so would include that amount on its balance sheet, that  
20 the Commission’s disallowance later would require a write-off by the Company, and  
21 that “[i]n the past, utilities have sometimes asserted that they will suffer harmful  
22 financial consequences as a result of any ordered write-off of deferrals, and have argued

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<sup>1</sup> Rebuttal Testimony of Kimberly K. Bolin, p. 5.

<sup>2</sup> *Id.* at 6.



1 that this alleged financial detriment requires or strongly suggests that the Commission  
2 allow recovery of all deferred amounts in a future rate case proceeding.”<sup>3</sup>

3 **Q. Do you agree with Ms. Bolin’s position?**

4 A. I do not, although I certainly agree that harmful financial consequences may result from  
5 a write-off.

6 **Q. Please explain.**

7 A. Ms. Bolin’s assertions regarding difficulties posed from potential write-offs are not  
8 only unsupported, they are not consistent. Nothing about the accounting treatment a  
9 utility applies to the recognition of revenues precludes the Commission from  
10 disallowing costs it does not believe should be recovered. The Commission has, on  
11 numerous occasions, disallowed costs that have resulted in write-offs.

12 **Q. Do you have other concerns with Ms. Bolin’s position on the deferral of carrying  
13 costs?**

14 A. Yes, her positions appear to contradict themselves. Any valid concerns regarding  
15 potential write-offs that arise from the deferral of carrying costs would apply equally  
16 to the deferral of the fuel, purchased power, and legal costs, which Ms. Bolin agrees to.  
17 In fact, the “harmful financial consequences” of writing off those costs would be  
18 greater since as stated above the balances are larger, which should, according to the  
19 rationale she explains in her testimony, make her less inclined to agree to their deferral.  
20 The Commission has repeatedly held that an AAO is not a ratemaking decision and that  
21 an AAO defers a final decision on extraordinary costs until a future rate recovery  
22 proceeding.

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<sup>3</sup> *Id.* at 6-7.

1 **Q. Does Ms. Bolin provide any basis for treating the carrying costs differently than**  
2 **the fuel, purchased power, and legal costs?**

3 A No.

4 **Q. Why should the Company be allowed to include carrying charges in the regulatory**  
5 **asset?**

6 A. If the Winter Storm Uri costs had flown through its FAC in its filing made in April  
7 2021, our customers would have seen a rate increase of over 62% on their bill due to  
8 the energy charges exceeding \$217M. Since Empire did not believe that would have  
9 been appropriate, it removed these costs from the FAC and requests to recover these  
10 costs over a substantially longer period than the six months contemplated by the current  
11 FAC. However, Empire has paid these expenses to its various creditors and is carrying  
12 this large, unexpected balance on its balance sheet. Therefore, it would be appropriate  
13 to allow the Company the opportunity to seek recovery of the carrying costs associated  
14 with this extraordinary event.

15 **Q. Has the Commission authorized the deferral of carrying costs for another AAO**  
16 **request by the Company?**

17 A. Yes. In file number EU-2011-0387 (2011 Tornado AAO), the Commission authorized  
18 and the parties agreed to allow carrying charges equal to the Company's ongoing  
19 Allowance for Funds Used During Construction rates.

20 **Q. You stated that the rate recovery proceeding for the Company's Storm Uri costs**  
21 **will likely be a securitization docket. Does the securitization statute mention**  
22 **carrying costs?**

23 A. Yes. RSMo. §393.1700.1(13) defines "Qualified extraordinary costs" as including  
24 "costs incurred prudently before, on, or after August 28, 2021, of an extraordinary

1 nature which would cause extreme customer rate impacts if reflected in retail customer  
2 rates recovered through customary ratemaking, such as but not limited to those related  
3 to purchases of fuel or power, inclusive of carrying charges, during anomalous weather  
4 events.”

5 **Q. Does the Company have proposed language that it believes would address Staff’s**  
6 **concerns?**

7 A. Yes. Recognizing that all ratemaking decisions, including the amount of recovery from  
8 customers and the application of carrying costs, will be determined in a future general  
9 rate case or securitization proceeding, the Commission could issue an AAO authorizing  
10 the Company to track and defer: (1) the remaining 5% of fuel and purchased power  
11 costs from February, 2021 (those not already deferred through the FAC process); (2)  
12 carrying costs on the total February 2021 fuel and purchased power expenditures; and  
13 (3) all other costs specifically related to Winter Storm Uri, including outside legal fees;  
14 with the requirement that Empire segregate all deferred costs by detailed cost category  
15 and provide enough detail for the Commission to perform a subsequent review for  
16 prudence and reasonableness.

17 **Q. Does Ms. Bolin make any other recommendations regarding the Company’s**  
18 **requested AAO?**

19 A. Yes. She recommends that “additional margin revenues sold during February 2021  
20 offset the costs that Empire is seeking to defer.”<sup>4</sup>

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<sup>4</sup> *Id.* at 7.

1 **Q. What “additional margin revenues” is Ms. Bolin referring to?**

2 A. She contends that “[d]ue to colder weather during this time period, Empire’s margin  
3 revenues appear to have increased materially.”<sup>5</sup> From the context in which the term  
4 “margin revenues” is used, I conclude that Ms. Bolin is claiming that Empire’s  
5 profitability increased materially during this time.

6 **Q. What is Ms. Bolin’s basis for that claim?**

7 A. She does not provide any.

8 **Q. Does Ms. Bolin explain how much the Company’s profitability increased or how  
9 much of that profit should be used to offset the costs it incurred?**

10 A. No, she does not.

11 **Q. Does Ms. Bolin explain how the Commission could or should measure the change  
12 in the Company’s profitability in February 2021 or how much profit it should be  
13 allowed to earn for that month?**

14 A. No, she does not.

15 **Q. If Ms. Bolin’s claims of increased revenues or increased profitability were  
16 supported by evidence, would the Company agree with her recommendation?**

17 A. No.

18 **Q. Please explain.**

19 A. The adjustment that Ms. Bolin proposes would be retroactive and arbitrary. To my  
20 knowledge, there is no statute or case precedent in Missouri by which a utility’s  
21 revenues could be confiscated after the fact solely on a belief that they may have  
22 “increased materially,” even if that belief was supported by evidence. By that standard,  
23 there could be many periods in which earnings by Missouri’s utilities would be subject

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<sup>5</sup> *Id.*

1 to Ms. Bolin's *ex post* adjustment, which would logically follow from the  
2 Commission's approval of the proposed adjustment in this proceeding.

3 **III. RESPONSE TO OPC REBUTTAL TESTIMONY**

4 **Q. Does OPC witness Dr. Marke agree with the Company's request to track and**  
5 **defer costs associated with Winter Storm Uri?**

6 A. No. Dr. Marke contends: (1) the amount requested is not material and an AAO is  
7 inappropriate given the pending rate case; (2) the 5% accounting deferral is a deliberate  
8 attempt to anchor extraordinary costs within the 95/5 framework but reassign cost  
9 responsibility solely to ratepayers; and (3) the Company is attempting to shift 100% of  
10 costs on to customers, earn a generous profit from a horrible situation, and spin its  
11 actions as a goodwill gesture for its customers.

12 **Q. Do you agree with Dr. Marke's characterizations?**

13 A. No.

14 **Q. Dr. Marke indicates the amount is not material and an AAO is inappropriate. Is**  
15 **the amount immaterial and the request for an AAO inappropriate?**

16 A. No. As mentioned above the balance at October 31, 2021 is \$10,699,573. This amount  
17 is higher than the average monthly Base Energy costs which the Company has been  
18 authorized in rates.<sup>6</sup>

19 **Q. Are there other reasons why you disagree with Dr. Marke?**

20 A. Yes. Dr. Marke fails to take into consideration that in a rate case, parties review test  
21 year and update period transactions and for those transactions that are deemed unusual  
22 in nature and are abnormal in frequency are generally normalized out of respective

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<sup>6</sup> According to the Company's October 1, 2021 FAC filing the average monthly Base Energy Cost is \$9,899,929.78

1 balances. Therefore, even though a portion of the AAO request occurred inside of our  
2 current rate case update period, due to the extraordinary nature, they would be  
3 normalized and removed from a “normal test year” balance. Therefore, in order for the  
4 Company to get the opportunity to present evidence on reasons why it should be  
5 allowed recovery it would be appropriate for the Commission to authorize special  
6 accounting for the costs. More significantly, however, is the fact that the Company  
7 desires to utilize the securitization statute and not begin to recover the Storm Uri costs  
8 through the current rate case, in order to provide a benefit to its customers. The reason  
9 why the AAO is needed in conjunction with a petition to securitize is discussed below.

10 **Q. Dr. Marke argues the Company is trying to nullify the “incentive” previous**  
11 **Commissions have put in place for electric utilities to manage their “ordinary”**  
12 **FAC costs. Do you agree with this characterization?**

13 A. No. While I agree that the Commission has set the 95/5% sharing mechanism related  
14 to fuel and purchased power costs to provide an incentive to manage ordinary costs,  
15 the costs that the Company requests be tracked and deferred in the AAO are not  
16 ordinary costs. These costs are extraordinary in nature and were outside the Company’s  
17 control. While the Commission and the parties have the obligation to ensure that the  
18 ultimate amount that is recovered from customers is appropriate, the Company should  
19 be allowed the opportunity to seek recovery of these prudently incurred costs.

20 **Q. On page 7 of his Rebuttal Testimony, Dr. Marke says the costs should be**  
21 **addressed in the current rate case or a securitization proceeding? Do you**  
22 **disagree?**

23 A. Somewhat. I agree that the securitization docket is the appropriate place for these costs  
24 to be addressed by the parties. However, if these costs are not ultimately recovered

1 through the securitization proceeding, the Company would need the AAO in place to  
2 seek recovery of these costs in a future rate case.

3 **Q. Why would these costs not be recovered through the securitization docket?**

4 A. The Company looks forward to working with the Commission and all stakeholders in  
5 Case No. EO-2022-0040, with the goal being the issuance of a financing order  
6 authorizing the securitization of all Storm Uri costs and the issuance of rate reduction  
7 bonds pursuant to RSMo. §393.1700. Unfortunately, however, there is no guaranty that  
8 this goal will be achieved. In the unlikely event that a financing order and rate reduction  
9 bonds are not issued pursuant to RSMo. §393.1700, the AAO will allow the Company  
10 to then seek recovery of its prudently incurred Storm Uri costs in a *future* rate case  
11 proceeding.

12 **Q. Why not address the costs in the current rate case as suggested by Dr. Marke?**

13 A. As noted above, the Company believes it will be beneficial for customers to have these  
14 costs included in the securitization docket versus traditional rate recovery.

15 **Q. What do you mean by beneficial for customers?**

16 A. Securitization is more beneficial for customers in this instance because traditional rate  
17 recovery would allow the costs to be included in the Company's rate base where a  
18 return would be earned based on the Company's awarded weighted average cost of  
19 capital. This approach would be like the Commission-authorized AAO treatment for  
20 the 2011 Tornado. As will be fully demonstrated in Empire's upcoming securitization  
21 filing in Case No. EO-2022-0040, the securitization process will yield financial benefits  
22 for Empire's customers in this instance.

23 **Q. Does this conclude your Surrebuttal Testimony?**

24 A. Yes, at this time.

**VERIFICATION**

I, Charlotte T. Emery, under penalty of perjury, on this 12th day of January, 2022,  
declare that the foregoing is true and correct to the best of my knowledge and belief.

/s/ Charlotte T. Emery



Surrebuttal Schedule CTE-1

Jurisdiction	Type	Docket No.	Docket Description
MO	Testimony	GR-2018-0013	In the Matter of Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Utilities' Tariff Revisions Designed to Implement a General Rate Increase for Natural Gas Service in the Missouri Service Areas of the Company
MO	Affidavit	EO-2018-0092	Affidavit in Support of Non-Unanimous Stipulation and Agreement In the Matter of the Application of the Empire District Electric Company for Approval of Its Customer Savings Plan
AR	Testimony	18-006-U	In the matter of an Investigation of The Effect on Revenue Requirements Resulting From Changes to Corporate Income Tax Rates Under the Tax Cuts and Jobs Act of 2017
AR	Testimony	16-053-U	In the matter of The Empire District Electric Company's Request for approval of its proposed Riverton Rider
KS	Testimony	18-GIMX-248-GIV	In the Matter of a General Investigation Regarding the Effect of Federal Income Tax Reform on the Revenue Requirements of Kansas Public Utilities and Request to Issue an Accounting Authority Order Requiring Certain Regulated Public Utilities to Defer Effects of Tax Reform to a Deferred Revenue Account
AR	Testimony	81-071-F	In the Matter of the determination of the rules regulating the rate and service of cogenerators and small power producers
AR	Testimony	18-055-TF	In the Matter of The Empire District Electric Company Request for Approval of a Tax Adjustment Rider to Provide Tax Benefits to its Retail Customers
AR	Testimony	18-054-TF	In the Matter of Liberty Utilities (Pine Bluff Water) Inc. Request for Approval of a Tax Adjustment Rider to Provide Tax Benefits to its Retail Customers
MO	Testimony	ER-2018-0366	In the Matter of a Proceeding Under Section 393.137 (SB 564) to Adjust the Electric Rates of The Empire District Electric Company
OK	Testimony	PUD 201800087	Application of Brandy L. Wreath, Director of the Public Utility Division, Oklahoma Corporation Commission, For a Public Hearing To Review and Monitor Application of the Fuel Adjustment Clause of Empire District Electric Company, a Kansas Corporation, for the Calendar Year 2017 and, For a Prudence Review of the Fuel Procurement Processes and Costs of Empire District Electric Company, A Kansas Corporation, for the Calendar Year 2017
KS	Testimony	19-EPDE-223-RTS	In the Matter of the Application of The Empire District Electric Company for Approval of the Commission to Make Changes in Charges for Electric Service
MO	Testimony	ER-2020-0093; EO-2020-0094	Fuel Adjustment Clause- October 1, 2019 Semi-Annual Update
MO	Testimony	ER-2020-0311; EO-2020-0312	Fuel Adjustment Clause- April 1, 2020 Semi-Annual Update
MO	Testimony	ER-2021-0097; EO-2021-0098	Fuel Adjustment Clause- October 1, 2020 Semi-Annual Update
MO	Testimony	ER-2021-0332; EO-2021-0333	Fuel Adjustment Clause- April 1, 2021 Semi-Annual Update
MO	Testimony	ER-2021-0312	In the Matter of the Request of The Empire District Company d/b/a Liberty for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in its Missouri Service Area
MO	Testimony	ER-2022-0095; EO-2022-0096	Fuel Adjustment Clause- October 1, 2021 Semi-Annual Update