

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the True-Up of The)
Empire District Electric Company’s Fuel)
Adjustment Clause (FAC))

File No. EO-2020-0094

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and for its recommendation respectfully states:

1. On October 1, 2019, The Empire District Electric Company (“Empire” or “Company”) filed an application concerning its twentieth true-up filing for Recovery Period 20(“RP20”),¹ as allowed by Commission Rule 20 CSR 4240-20.090(9), in order to remedy an over-collection of \$2,140,520 from its customers.

2. Rule 20 CSR 4240-20.090(9)(D) requires the Commission’s Staff to examine and analyze the information Empire has submitted and to submit a recommendation to the Commission not later than 30 days after Empire made its filing—in this case, no later than November 1, 2019.

3. As explained in Staff’s *Memorandum*, attached hereto as Appendix A and incorporated herein by reference, Staff recommends the Commission approve Empire’s twentieth true-up filing for RP20, during which Empire over-collected \$2,140,520 from its customers.

4. Staff reviewed and analyzed the direct testimony, supporting schedules and work papers of Empire witness Charlotte T. Emery. Staff has determined that Empire’s calculations for the true-up amount for RP20 are correct. The over-collected

¹ December 2018 through May 2019.

amount will be returned to the customers as it will be included in the calculation of the FPA amount in the Company's AP22 adjustment filing in File No. ER-2020-0093.

5. Staff has verified that Empire has filed its 2018 annual report and is not delinquent on any assessment. Empire is current on its submission of its Surveillance Monitoring reports as required in 20 CSR 4240-20.090(6), and its periodic reports as required by 20 CSR 4240-20.090(5). With the exception of Empire's proposed changes to its current annual fuel adjustment rates in its semi-annual FAC filing in File No. ER-2020-0093, Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

WHEREFORE, Staff submits its analysis and recommends that the Commission approve Empire's twentieth true-up filing for RP20 during which Empire over-collected \$2,140,520 from its customers.

Respectfully Submitted,

/s/ Travis J. Pringle

Travis J. Pringle

Legal Counsel

Missouri Bar No. 71128

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Missouri Public Service Commission

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 1st day of November, 2019, to all counsel of record.

/s/ Travis J. Pringle

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. EO-2020-0094
The Empire District Electric Company

FROM: Cynthia M. Tandy, Utility Regulatory Auditor I
Lisa Wildhaber, Utility Regulatory Auditor III
Brooke Mastrogiannis, Utility Regulatory Auditor IV

DATE: /s/ Brad J. Fortson 11/01/2019 /s/ Travis Pringle 11/01/2019
Energy Resources Department / Date Staff Counsel Division/ Date

SUBJECT: Staff's Analysis of and Recommendation Concerning The Empire District Electric Company's Twentieth Fuel Adjustment Clause True-up Filing Under the Provisions in 20 CSR 4240-20.090(9).

DATE: November 01, 2019

On October 1, 2019, The Empire District Electric Company ("Empire" or "Company") filed with the Missouri Public Service Commission ("Commission"), in the form of direct testimony and supporting schedules of Empire witness Charlotte T. Emery, its twentieth true-up filing under the provisions of 20 CSR 4240-20.090(9).

Accumulation Period 20 ("AP20") includes the time period March 1, 2018 through August 31, 2018 and is followed by Recovery Period 20 ("RP20"), which includes the billing months of December 2018 through May 2019. The true-up amount of (\$2,140,520)¹ identified in this filing is the result of an over-recovery of the Fuel and Purchased Power Adjustment ("FPA") amount for AP20 during RP20.

The true-up amount of (\$2,140,520) for RP20 is included in the calculation of the Fuel and Purchased Power ("FPA") amount included in the Company's Accumulation Period 22 ("AP22") adjustment filing, also filed on October 1, 2019, in File No. ER-2020-0093, which Empire filed in compliance with its FAC.²

¹ An amount in parenthesis is a credit to the customer.

² The Empire District Electric Company's P.S.C. Mo. No. 5, Section 4, Original Sheet No. 17ab tariff sheet:

TRUE-UP OF FPA: In conjunction with an adjustment to its FAR, the Company will make a true-up filing with an adjustment to its FAC on the first Filing Date that occurs after completion of each Recovery Period. The true-up adjustment shall be the difference between the FPA revenues billed and the FPA revenues authorized for collection during the true-up recovery period, i.e. the true-up

The Commission Staff (“Staff”) examined the direct testimony of Empire witness Charlotte T. Emery, the supporting schedules and work papers Empire provided with its true-up filing in this case, and the monthly information Empire has submitted to the Commission. Staff also reviewed and agrees with Empire’s monthly interest calculations for RP20.

Based on its examination and analysis of information Empire filed and submitted in this case, Staff recommends the Commission approve Empire’s RP20 true-up filing for the billing months December 2018 through May 2019 during which Empire over-recovered \$2,140,520 from its customers for inclusion in the calculation of the FPA amount in the Company’s AP22 adjustment filing in File No. ER-2020-0093.

Staff has verified that Empire has filed its 2018³ annual report and is not delinquent on any assessment. Empire is current on its submission of its Surveillance Monitoring reports as required in 20 CSR 4240-20.090(6) and its monthly reports as required by 20 CSR 4240-20.090(5). Staff is not aware of any other matter before the Commission that affects or is affected by this filing, except as noted herein.

adjustment. Any true-up adjustments or refunds shall be reflected in item T above and shall include interest calculated as provided for in item I above.

³ The Company did file its 2018 Annual Report on May 15, 2019, meeting the extension deadline.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the True-Up of)
The Empire District Electric Company's)
Fuel Adjustment Clause (FAC)) File No. EO-2020-0094

AFFIDAVIT OF CYNTHIA M. TANDY

STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

COMES NOW CYNTHIA M. TANDY and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation regarding Twentieth Fuel Adjustment Clause True-up, in Memorandum form*; and that the same is true and correct according to her best knowledge and belief.

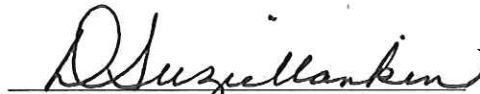
Further the Affiant sayeth not.


CYNTHIA M. TANDY

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 1st day of November 2019.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: December 12, 2020
Commission Number: 12412070


Notary Public

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the True-Up of)
The Empire District Electric Company's) File No. EO-2020-0094
Fuel Adjustment Clause (FAC))

AFFIDAVIT OF LISA WILDHABER

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

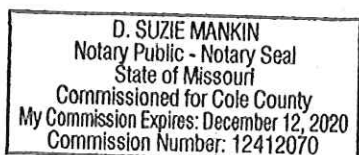
COMES NOW LISA WILDHABER and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation regarding Twentieth Fuel Adjustment Clause True-up, in Memorandum form*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.


LISA WILDHABER

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 1st day of November 2019.




Notary Public

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the True-Up of)
 The Empire District Electric Company's) File No. EO-2020-0094
 Fuel Adjustment Clause (FAC))

AFFIDAVIT OF BROOKE MASTROGIANNIS

STATE OF MISSOURI)
) ss.
 COUNTY OF COLE)

COMES NOW BROOKE MASTROGIANNIS and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation regarding Twentieth Fuel Adjustment Clause True-up, in Memorandum form*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

Brooke Mastrogiannis
 BROOKE MASTROGIANNIS

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 1st day of November 2019.

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| D. SUZIE MANKIN Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: December 12, 2020 Commission Number: 12412070 |
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D. Suzie Mankin
 Notary Public