

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

In the Matter of The Empire District Gas)
Company’s Purchased Gas Adjustment) Case No. GR-2018-0122
Tariff Filing)

**SUPPLEMENTAL RESPONSE TO STAFF RECOMMENDATION
AND MEMORANDUM**

COMES NOW The Empire District Gas Company (“EDG” or “Company”), and, to supplement and clarify its January 31, 2019, response to the Staff Recommendation and Memorandum, respectfully states as follows to the Missouri Public Service Commission (Commission):

INTRODUCTION

1. On December 17, 2018, the Staff of the Commission (Staff) filed its *Staff Recommendation Regarding the 2016-2017 Actual Cost Adjustment of The Empire District Gas Company* and an attached Memorandum (Staff Recommendation and Memorandum) in this matter. This document set out the results of Staff’s analyses and recommendations concerning EDG’s 2016- 2017 Actual Cost Adjustment (ACA) filing.

2. The Commission directed that EDG respond to the Staff Recommendation by January 31, 2019.

3. EDG responded to the various issues identified by Staff. The purpose of this filing is to clarify the Company’s position on one topic and to supply a tabulation in lieu of one appearing on page 3 of the Response.

BILLED REVENUE AND ACTUAL GAS COSTS

To clarify its statement concerning “Gas Procurement Practices” at the bottom of page 1 and the top of page 2 of its Response, the Company agrees with Staff’s determination of the

ACA balances for the 2016-2017 ACA period. Accordingly, the Company agrees with the Staff's recommended balance adjustments designed to reflect the (over)/under recovery balances for the ACA accounts as reflected in the following table:

Description + Under-recovery (-) Over-recovery	8-31-17 Ending Balances Per Filing	Commission Approved Adjustments 2014-2015 ACA (A)	Staff Adjustments For 2015-2016 ACA (A-1)	Staff Adjustments For 2016-2017 ACA	8-31-17 Staff Recommended Ending Balances
South System: Firm ACA	\$1,026,714	B \$4,118 C \$11,308 D \$ (3,425)	\$0	\$1,594	\$1,040,309
Interruptible ACA	\$0	\$0	\$0	\$0	\$0
Take-or-Pay (TOP)	\$0	\$0	\$0	\$0	\$0
Transition Cost (TC)	\$0	\$0	\$0	\$0	\$0
Refund	\$0	\$0	\$0	\$0	\$0
North System: Firm ACA	\$726,843	A \$ (13,595) C \$ (1,140) D \$1,653	E \$ (11,112)	\$ (513)	\$702,136
Interruptible ACA	\$0	\$0	\$0	\$0	\$0
Take-or-Pay (TOP)	\$0	\$0	\$0	\$0	\$0
Transition Cost (TC)	\$0	\$0	\$0	\$0	\$0
Refund	\$0	\$0	\$0	\$0	\$0
Northwest System: Firm ACA	\$ (275,529)	\$0	\$0	\$0	\$ (275,529)
Interruptible ACA	\$0	\$0	\$0	\$0	\$0
Take-or-Pay (TOP)	\$0	\$0	\$0	\$0	\$0
Transition Cost (TC)	\$0	\$0	\$0	\$0	\$0
Refund	\$0	\$0	\$0	\$0	\$0

(A) Commission Order issued February 16, 2017 in Case No. GR-2016-0099 approving adjusted amounts from 2014-2015 ACA. Empire has not included these adjustments in its 2015-2016 ACA nor in its 2016-2017 ACA filing.

- A End user Adjustment
- B "Spot" Market Price Adjustment
- C Cheyenne Plains Pipeline Reservation Charges Re-Allocation
- D Demand Charge Allocation

(A-1) Commission Order issued February 15, 2018 in Case No. GR-2017-0134 approving adjusted amounts from 2015-2016 ACA. Due to the timing of Commission's order, Empire has not included these adjustments in its 2016-2017 ACA.

- E Restates North System 8-31-15 Firm ACA balance to \$323,977 under-recovery as approved in Case No. GR-2016-0099. The Company had filed \$335,089 under-recovery requiring the \$11,112 Staff adjustment.

In all other respects, EDG restates, ratifies and confirms its Response.

WHEREFORE, having clarified and supplemented its previous Response, The Empire District Gas Company respectfully requests that the Commission issue such orders as it believes to be reasonable and just.

Respectfully submitted,

/s/ Dean Cooper

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail on February 11, 2019, to the following:

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