



August 23, 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 Utilities or
Liberty; General Rate Case Filing – Case No. GR-2021-0320**

Dear Judge Woodruff:

On behalf of The Empire District Gas Company d/b/a Liberty Utilities or Liberty (“EDG”), I am providing herewith to the Missouri Public Service Commission (the “Commission”) for filing, in electronic form, certain tariff sheets which are designed to increase EDG’s annual base distribution gas revenues by approximately \$1.36 million, exclusive of applicable gross receipts, sales, franchise, or occupational fees or taxes. The proposed increase expressed as a percentage of total revenues, including gas revenues, is 4.16%, or 6.64% excluding gas revenues.

The specific schedules being submitted are shown on the attached **Exhibit No. 1**. All of these schedules bear a date of issue of August 23, 2021, and an effective date thirty days thereafter.

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 EDG witnesses:

Witness	Title	Topic(s)
Michael D. Beatty	Vice President of Natural Gas & Water Operations for the Liberty Utilities Central Region	Policy Summary of Rate Changes Introduction of Witnesses
Dana Liner	Manager - Rates and Regulatory Affairs	Revenue Requirement
LaToya Johnson	Senior Analyst - Rates and Regulatory Affairs	Minimum Filing Requirements, Prior stipulations
James (Jay) Young	Analyst - Rates and Regulatory Affairs	Tariff Changes
John J. Reed	Consultant	Return on Equity Reasonableness of Capital Structure

Todd Mooney	Vice President, Finance & Administration at Liberty Utilities (Canada) Corp.	Capital Structure
Timothy S. Lyons	Consultant	Lead Lag Study Cash Working Capital Study Class Cost of Service Rate Design, including Weather Normalization Adjustment Rider
Jon Harrison	Director of Customer Experience for the Liberty Utilities Co.	Customer Experience Low-Income Affordability Program
Nathaniel W. Hackney	Senior Reporting and Systems Analyst for the Liberty Utilities Co.	Energy Efficiency
Jill Schwartz	Director of Regulatory Shared Services	CAM Affiliate Allocations
Dan T. Stathos	Consultant	Depreciation Study
James A. Fallert	Consultant	Pension/OPEB

The proposed rate increase is necessary to generally offset or reflect increases in operating costs, the construction of new gas service facilities, as well as return requirements on rate base. EDG's base rates were last increased effective April 1, 2010 by virtue of EDG's previous rate case, File No. GR-2009-0434.

The remaining information required by Commission Rule 20 CSR 4240-3.030(3)(B) is being filed herein as part of the Direct Testimony of EDG witness LaToya Johnson, 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.

The tariff filing and supporting testimony supersede a similar filing made on August 16, 2021 which was voluntarily withdrawn by EDG on August 18, 2021 due to an inadvertent error in calculating the revenue requirement.

A copy of this letter and filing is being provided to the Staff Counsel and the Office of the Public Counsel. 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,

James M. Fischer

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Attorney for The Empire District Gas Company,
d/b/a Liberty Utilities or Liberty

Exhibit No. 1

New tariff sheet	New Revision Number	Type of revision
2	3rd Revised	Index Update
2a	Original	Supplemental Index
8a	Original	Service Area Map
8b	Original	Service Area Map
8c	Original	Service Area Map
8d	Original	Service Area Map
8e	Original	Service Area Map
8f	Original	Service Area Map
8g	Original	Service Area Map
8h	Original	Service Area Map
8i	Original	Service Area Map
8j	Original	Service Area Map
8k	Original	Service Area Map
8l	Original	Service Area Map
8m	Original	Service Area Map
9	2nd Revised	Rate Change, Schedule name Change
9.a	1st Revised	Reserved for future use
10	2nd Revised	Rate Change, Schedule name Change
10.a	1st Revised	Reserved for future use
11	2nd Revised	Rate Change, Schedule name Change, Availability change
11.1	1st Revised	Reserved for future use
11a	1st Revised	Reserved for future use
11.b	1st Revised	Reserved for future use
12	2nd Revised	Rate Change, Schedule name Change
13.a	1st Revised	Reserved for future use
14	2nd Revised	Rate Change
15.a	1st Revised	Reserved for future use
23	2nd Revised	Language and naming changes
28	2nd Revised	Name changes, Language clarification Section 7.A.
29	2nd Revised	Language clarification No. 14.
30	2nd Revised	Language clarification Nos. 17. and 21.
32	2nd Revised	Language addition Subsection E.1.D.
33	2nd Revised	Delivery charge change, Schedule name Change
34	2nd Revised	Customer charge, delivery charge, language and naming changes
35	2nd Revised	Removed section H.
36	2nd Revised	Reserved for future use

36.a	1st Revised	Reserved for future use
37	2nd Revised	Customer charge, delivery charge, language and naming changes
38.a	1st Revised	Reserved for future use
39	2nd Revised	Delivery and Demand charge change
40.a	1st Revised	Reserved for future use
41	2nd Revised	Removal of special contract customers
42	2nd Revised	Language change in first paragraph
43	2nd Revised	Language changes in 2.A., B., C., D.
45	2nd Revised	Language and naming changes
46	2nd Revised	Language and naming changes
56	1st Revised	Language change in II.C.
57	1st Revised	Language change in III.
58	1st Revised	Reserved for future use
59	1st Revised	Reserved for future use
73	Original	WNAR
74	Original	WNAR
75	Original	WNAR
76	Original	WNAR
R-2	2nd Revised	Item changes in item 9
R-24	1st Revised	Name Changes
R-51a	1st Revised	Revised Low Income Program Section 9.07
R-51a.1	Original	Revised Low Income Program Section 9.07
R-51b	1st Revised	Revised Low Income Program Section 9.07
R-51c	2nd Revised	Revised Low Income Program Section 9.07
R-51d	2nd Revised	Budget Amount change
R-51g	2nd Revised	Revised High-Efficiency Appliance Rebate Program
R-51g.1	Original	Revised High-Efficiency Appliance Rebate Program (cont)
R-51h	2nd Revised	EDG Energy Education Program
R-51i	2nd Revised	Energize EDG Homes
R-51j	2nd Revised	Energize EDG Homes (cont)
R-51k	1st Revised	Reserved for future use
R-51l	2nd Revised	Reserved for future use
R-51m	2nd Revised	Reserved for future use
R-51n	2nd Revised	Reserved for future use

Existing		Proposed	
Existing Schedule	Existing Schedule Name	New Schedule	New Schedule Name
RS	Residential Service	RS	Residential Service

SCFS	Small Commercial Firm Service Small	SGS	Small General Service
SCFM	Small Commercial Firm Service Medium	MGS	Medium General Service
SCFL	Small Commercial Firm Service Large		
LVF	Large Volume Firm Service	LGS	Large General Service
LVI	Large Volume Interruptible Service	LVI	Large Volume Interruptible Service
SVFTS	Small Volume Firm Transportation Service Small	SGST	Small General Service
SVFTM	Small Volume Firm Transportation Service Medium	MGST	Medium General Service
SVFTL	Small Volume Firm Transportation Service Large		
LVFT	Large Volume Firm Transportation Service	LGST	Large General Service
LVFRT	Large Volume Flexible Rate Transportation Service	LVFRT	Large Volume Flexible Rate Transportation Service