

2013 through November 2013) are correct. The over-recovered amount, including accumulated interest, is included in Empire's calculation of its proposed current period Fuel Adjustment Rate ("FAR") amount included in the Company's Accumulation Period 11 (AP11) adjustment filing, also filed on April 1, 2014, in File No. ER-2014-0264.¹

5. Staff has verified that Empire has filed its 2013 annual report and is not delinquent on any assessment. Empire is current on its submission of its Surveillance Monitoring reports as required in 4 CSR 240-20.090(10), and its monthly reports as required by 4 CSR 240-3.161(5). With the exception of Empire's proposed current period FAR contained in its semi-annual FAC filing in File No. ER-2014-0264, 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 ninth true-up filing for Recovery Period 9 under the provisions of 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

¹ *In the Matter of The Empire District Electric Company for Authority to Implement Rate Adjustments Related to The Company's Fuel And Purchased Power Adjustment (FAC) Required in 4 CSR 240-20.090(4)*, filed on April 1, 2014. In this case, Empire requested Commission approval of a tariff sheet to adjust rates for the FAC includable costs experienced during the six-month accumulation period (AP11).

Respectfully Submitted,

**STAFF OF THE MISSOURI
PUBLIC SERVICE COMMISSION**

/s/ Robert S. Berlin

Robert S. Berlin
Senior Counsel
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered or transmitted by facsimile or electronic mail to all counsel of record this 29th day of April, 2014.

/s/ Robert S. Berlin

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. EO-2014-0265
The Empire District Electric Company

FROM: Matthew Barnes, Utility Regulatory Auditor IV
David Roos, Regulatory Economist III

DATE: /s/ John Rogers 04/29/2014 /s/ Robert S. Berlin 04/29/2014
Energy Resource Analysis Unit / Date Staff Counsel's Office / Date

SUBJECT: Staff's Analysis of and Recommendation Concerning The Empire District Electric Company's Ninth Fuel Adjustment Clause True-up Filing Under the Provisions in 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

DATE: April 29, 2014

On April 1, 2014, 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 by Todd W. Tarter, its ninth true-up filing under the provisions in 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

The true-up amount of \$(231,336) identified in this filing is the result of an over-collection during Recovery Period 9 ("RP9") that includes the billing months of June 2013 through November 2013. RP9 is the recovery period for and following Accumulation Period 9 ("AP9") that includes the period of September 1, 2012 through February 28, 2013.

The over-collection of \$231,336 true-up amount for RP9 is included in the calculation of the Fuel and Purchased Power Adjustment ("FPA") amount included in the Company's Accumulation Period 11 ("AP11") adjustment filing, also filed on April 1, 2014, in File No. ER-2014-0264, in compliance with Empire's FAC.¹

The Commission's Staff ("Staff") examined the direct testimony of Todd W. Tarter, the supporting schedules Empire provided with its application in this case, and the monthly information Empire has submitted to the Commission. Staff also reviewed Empire's monthly interest calculations; Staff agrees with them.

¹ The Empire District Electric Company's P.S.C. Mo. No. 5, Section 4, 6th Revised Sheet No. 17c tariff sheet: "TRUE-UP OF FPA: In conjunction with an adjustment to its FAR, the Company will make a true-up filing with and 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 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."

Based on its examination and analysis of information Empire filed and submitted in this case, Staff recommends the Commission approve Empire's RP9 true-up filing for the billing months June 2013 through November 2013 during which Empire over-collected \$231,336 from its customers for inclusion in the calculation of the FPA amount included in the Company's AP11 adjustment filing in File No. ER-2014-0264.

Staff has verified that Empire has filed its 2013 annual report and is not delinquent on any assessment. Empire is current on its submission of its Surveillance Monitoring reports as required in 4 CSR 240-20.090(10) and its monthly reports as required by 4 CSR 240-3.161(5). Staff is not aware of any other matter before the Commission that affects or is affected by this filing, except as noted herein.


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)) Case No. EO-2014-0265

AFFIDAVIT OF MATTHEW J. BARNES

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Matthew J. Barnes, of lawful age, on oath states: that he participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was provided to him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief.



Matthew J. Barnes

Subscribed and sworn to before me this 29th day of April, 2014.

LAURA BLOCH
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: June 21, 2015
Commission Number: 11203914



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 Fuel)
Adjustment Clause (FAC)) Case No. EO-2014-0265

AFFIDAVIT OF DAVID C. ROOS

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

David C. Roos, of lawful age, on oath states: that he participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was provided to him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief.



David C. Roos

Subscribed and sworn to before me this 29th day of April, 2014.





Notary Public