DEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Seventh Prudence Review) of Costs Subject to the Commission-Approved) Fuel Adjustment Clause of The Empire District) Electric Company.

STAFF'S SEVENTH PRUDENCE REVIEW REPORT

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and submits Staff's Seventh Prudence Review Report of the costs subject to the fuel adjustment clause ("FAC") of The Empire District Electric Company ("Empire"). As a result of its prudence review of FAC costs, the Staff has identified no evidence of imprudence on the part of Empire and, in support thereof, states as follows:

- 1. On March 9, 2018, the Staff filed Staff's Notice of Start of Seventh Fuel Adjustment Clause Prudence Review ("Notice") informing the Commission that it had begun its audit of the costs subject to Empire's FAC. On March 21, 2018, the Commission issued its Order Directing Notice, Acknowledging Automatic Parties, Establishing Deadlines For Intervention And For Requesting a Hearing ("Order"). The Order required Staff's audit report to be filed no later than September 5, 2018.
- 2. Staff's Notice set forth a plan for examining and analyzing the costs and revenues associated with Empire's commission-approved FAC for the period September 1, 2016, to February 28, 2018. This review period corresponds to the seventeenth through nineteenth sequential FAC accumulation periods since the Commission first authorized an FAC for Empire.
- 3. The Staff has completed its prudence review and provides a detailed discussion of its findings in Staff's Seventh Prudence Review of Costs Related To The Fuel Adjustment Clause For The Electric Operations Of The Empire District Electric

Company ("Prudence Review Report") attached as Appendix A in Confidential and Public formats. As a result of its prudence review, and as more fully explained in the Prudence Review Report, the Staff identified no instances of imprudence on the part of Empire during the period of review.

WHEREFORE, the Staff of the Missouri Public Service Commission prays the Commission accept its Prudence Review Report of Empire's fuel adjustment clause.

Respectfully submitted,

/s/ Robert S. Berlin

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 5th day of September, 2018.

/s/ Robert S. Berlin