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May 29, 2001

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Director, Administration

DALE HARDY ROBERTS  
Secretary/Chief Regulatory Law Judge

DANA K. JOYCE  
General Counsel

**FILED**

MAY 29 2001

Missouri Public  
Service Commission

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102

**RE: Case No. ER-2001-299 – In the Matter of the Empire District Electric Company's tariff sheets designed to implement a general rate increase for retail electric service provided to customers in the Missouri service area of the Company**

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of **ADDENDUM TO STAFF'S STATEMENT OF POSITIONS ON THE ISSUES**.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

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SD:ccl  
Enclosure  
cc: Counsel of Record

FILED

BEFORE THE PUBLIC SERVICE COMMISSION MAY 29 2001

OF THE STATE OF MISSOURI

Missouri Public  
Service Commission

In the matter of The Empire District Electric )  
Company's tariff sheets designed to implement a )  
general rate increase for retail electric service )  
provided to customers in the Missouri service area )  
of the Company )

Case No. ER-2001-299

**ADDENDUM TO STAFF'S STATEMENT OF POSITIONS ON THE ISSUES**

Comes now the Staff of the Missouri Public Service Commission (Staff) in response to the Commission's May 24, 2001 Order Directing Filing and provides a supplement to the Staff's Statement Of Positions On The Issues previously filed herein. The Staff hereby submits the following supplemental statement of position for the fuel and purchased power expense issue, which is item "8." in the Addendum To List Of Issues, List Of Witnesses And Order Of Cross-Examination, also filed this date, but is item "7." in the instant Addendum To Staff's Statement Of Positions On The Issues:

**7. Cost of Service - Fuel and Purchased Power**

What should be the appropriate methodology and level of fuel and purchased power expense for the Commission to adopt in this case?

**Staff's Position:** The appropriate methodology and level of fuel and purchased power expense for the Commission to adopt in this case are described in the nonunanimous Stipulation And Agreement Regarding Fuel And Purchased Power Expense/"Joint Recommendation" filed on May 14, 2001.

Wherefore the Staff submits the instant Addendum To Staff's Statement Of Positions On The Issues in response to the Commission's May 24, 2001 Order Directing Filing.

Respectfully submitted,

DANA K. JOYCE  
General Counsel



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Chief Deputy General Counsel  
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**Certificate of Service**

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 29th day of May 2001.



**Service List for**  
**Case No. ER-2001-299**  
**Verified: May 22, 2001 (ccl)**

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