

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

In the matter of The Empire District Electric)
Company of Joplin, Missouri for Authority to File)
Tariffs Increasing Rates for Electric Service)
Provided to Customers in the Missouri Service)
Area of the Company.)

Case No. ER-2011-0004

REQUEST FOR CLARIFICATION REGARDING TRUE-UP RECONCILIATION

COMES NOW the Staff (“Staff”) of the Missouri Public Service Commission (“Commission”), by and through Staff Counsels Office, and for its *Request for Clarification Regarding True-up Reconciliation* states as follows:

1. On May 6, 2011, Staff filed a reconciliation of the parties’ positions through surrebuttal, pursuant to the Commission’s November 16, 2011, *Order Setting Procedural Schedule, Establishing Test Year, Establishing Other Procedural Requirements, and Adopting Proposed Customer Notice with Modifications*. Staff utilized the same reconciliation format it has utilized in recent prior Empire cases.

2. In its pleading accompanying the May 6 Reconciliation, Staff explained that the May 6 Reconciliation does not take into account positions reflected in true-up direct filings also made on May 6, as it was not yet known what positions other parties will take in the context of the true-up proceeding in this case.

3. Though it was not explicitly stated, Staff’s May 6 Reconciliation necessarily did not include positions reflected in parties’ true-up rebuttal filings, as those filings had not yet been made, and will not be made until May 20, 2011.

4. In its pleading accompanying the May 6 Reconciliation, Staff indicated that it would will file a reconciliation reflecting a comparison of the true-up positions of it and other parties to this proceeding at an appropriate later date.

5. On April 10, 2011, the Commission entered its *Order Granting Staff's Request Regarding Confidential Testimony and Setting Deadline and Format for Updated Reconciliation*, in which it ordered:

The Staff of the Missouri Public Service Commission shall file a revised and updated revenue requirement reconciliation no later than May 18, 2011. The reconciliation shall make a full, side-by-side comparison of the parties' positions, including all parties that have positions on revenue requirement. At minimum, this will include the company's positions compared to Staff's and the Office of the Public Counsel's positions.

TRUE-UP RECONCILIATION FILING DATE

6. Because parties' true-up rebuttal filings will not yet have been made as of May 18, and will not be made until May 20, Staff seeks clarification as to whether the Commission desires a reconciliation of the parties' direct-filed true-up positions, or a reconciliation of the parties' complete true-up positions, including those presented in true-up rebuttal to be filed May 20, 2011.

7. Staff anticipates that it will be able to prepare and file a complete true-up reconciliation by no later than May 27, well in advance of the true-up hearing scheduled for June 6 and 7.

TRUE-UP RECONCILIATION FILING FORMAT

8. Staff seeks clarification as to whether the Commission's reference to "a full, side-by-side comparison of the parties' positions" is a reference to the reconciliation format utilized in Ameren Missouri File No. ER-2011-0028, as distinguished from the format utilized to date in this case, File No. ER-2011-0004.

WHEREFORE, Staff respectfully requests clarification regarding the Commission's *Order Granting Staff's Request Regarding Confidential Testimony and Setting Deadline and Format for Updated Reconciliation*.

Respectfully submitted,

/s/ Sarah Kliethermes
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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 11th day of May, 2011.

/s/ Sarah Kliethermes_____