

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

In the Matter of the Application of The)
Empire District Electric Company for) Case No. EO-2018-0092
Approval of Its Customer Savings Plan)

**AFFIDAVIT OF PETER EDWARDS IN OPPOSITION TO NONUNANIMOUS
STIPULATION AND AGREEMENT FILED APRIL 24, 2018**

Capacity

The Empire District Electric Company already has more than sufficient generating resources to serve its customers. Excluding Asbury, Empire’s current generation resources total 1233 MW.¹ Asbury has an accredited capacity of 198 MW.² Empire historical all-time peak was 1199 MW.³

Uncertainties

There are numerous uncertainties⁴ in Empire’s original proposal and which remain uncertain under the Stipulation and Agreement. The risks associated with such uncertainties falls on Empire’s customers. Such uncertainties include, but are not limited to: Identification of Contractor for Wind Project;⁵ Identification of Tax Equity Partner;⁶ Location of Wind Projects;⁷ Transmission Costs;⁸ Market Prices in the SPP Market;⁹ Generation mix at SPP;¹⁰ and Frequency of Negative Market Prices.¹¹

¹ Mertens Direct, p. 17.
² Mertens Direct, p. 16.
³ Mertens Direct, p. 17.
⁴ See generally, Mantle Surrebuttal, Schedule LMM-S-1.
⁵ Meyer Rebuttal, p. 4.
⁶ Meyer Rebuttal, 4.
⁷ Meyer Rebuttal, 4.
⁸ Meyer Rebuttal, 4.
⁹ Mantle Rebuttal, 6; Meyer Rebuttal, 10.
¹⁰ Mantle Rebuttal 13; Meyer Rebuttal, 16.
¹¹ Mantle, 8-9; Meyer Rebuttal, 16-17.

Rate Impacts

The citizens of Joplin have already experienced significant rate increases in recent years as evidenced below.

October 2, 2001		
Residential Service - Monthly Rate		
	Summer Season	Winter Season
Customer Charge	8.22	8.22
The first 600-kWh, per kWh	0.0697	0.0697
Additional kWh, per kWh	0.0697	0.0411

Current Rates		
Residential Service - Monthly Rate		
	Summer Season	Winter Season
Customer Charge	13.00	13.00
The first 600-kWh, per kWh	0.13006	0.13006
Additional kWh, per kWh	0.13006	0.10574

Percentage Increase		
	Summer Season	Winter Season
Customer Charge	58.15%	58.15%
The first 600-kWh, per kWh	86.60%	86.60%
Additional kWh, per kWh	86.60%	157.27%

The “Customer Savings Plan” proposed by the Company, as modified by the Stipulation and Agreement will increase current rates by an additional 12%.¹²

Joplin Position on Stipulation

The City of Joplin maintains its position as set forth in its previously filed Position Statement and Objection -- in opposition to both the Customer Savings Plan as originally filed and to the Nonunanimous Stipulation and Agreement filed April 24, 2018.

¹² Supporting Affidavit of Greg Meyer.