

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

In the Matter of the Petition of The Empire)
District Electric Company d/b/a Liberty to)
Obtain a Financing Order that Authorizes) **Case No. EO-2022-0040**
the Issuance of Securitized Utility Tariff)
Bonds for Qualified Extraordinary Costs)

In the Matter of the Petition of The Empire)
District Electric Company d/b/a Liberty to)
Obtain a Financing Order that Authorizes) **Case No. EO-2022-0193**
the Issuance of Securitized Utility Tariff)
Bonds for Energy Transition Costs Related)
to the Asbury Plant)

**STAFF MOTION FOR LEAVE TO FILE OUT OF TIME
ISSUE AND POSITION STATEMENT**

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and respectfully requests leave to add an out-of-time issue and position statement, and in support states the following:

1. In the process of preparing the joint list of issues in this case, one issue was inadvertently omitted in the process.
2. Staff respectfully requests leave to add Issue 8, as identified below. Adding Issue 8 will not involve additional testimony or witnesses to the schedule.
3. Issue 8 should state, “How should securitized utility tariff charges be initially allocated among retail customer classes?”
4. Staff’s position statement for Issue 8 should state, “Securitized utility tariff charges should be initially allocated among retail customer classes on the basis of energy sales, measured in kilowatt-hour (kWh), adjusted for losses based on voltage.”¹

¹ Lange Rebuttal at page 2, lines 9-15, pages 25–32; Luebbert Rebuttal at page 2, lines 3-12, page 2–13.

WHEREFORE, Staff respectfully requests the Commission grant Staff's request for leave to add Issue 8 and Staff's Position Statement on Issue 8 as identified above; Staff further requests leave be granted all parties to file position statements on this Issue 8.

Respectfully submitted,

/s/ Curt Stokes

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**Counsel for Staff of the
Missouri Public Service Commission**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 10th day of June, 2022, to all parties and/or counsels of records.

/s/ Curt Stokes

Curt Stokes