

**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 the Issuance) **Case No. EO-2022-0040**
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 the Issuance) **Case No. EO-2022-0193**
of Securitized Utility Tariff Bonds for Energy)
Transition Costs Related to the Asbury Plant)
)

MOTION TO ADMIT EXHIBIT 116 AND MOTION FOR EXPEDITED RESPONSE

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and requests admission of Staff Exhibit 116, attached hereto and incorporated by reference.

In support, Staff states:

1. During the hearing on Tuesday, June 14, 2022, the Commission requested and the Office of Public Counsel further requested an exhibit reflecting differences in the depreciation calculations of Liberty, Staff, and the Office of Public Counsel. Tr. at 223:11-225:24.

2. On Thursday, June 16, 2022, Staff circulated a proposed Exhibit 116 to Exhibits@psc.mo.gov, and to counsel for the parties.

3. Staff now wishes to admit Exhibit 116 into the record.

4. As for its Motion for Expedited Response, Staff requests an order admitting the exhibit no later than close of business Wednesday, July 13, 2022. Admitting the exhibit by this date will allow the parties to cite to Exhibit 116 if necessary. This motion is filed as

soon as it could have after coming to the attention of Staff that Exhibit 116 had not yet been admitted to the record.

Respectfully submitted,

/s/ Curt Stokes

Curt Stokes

Chief Deputy Counsel

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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 11th day of July, 2022, to all parties and/or counsels of records.

/s/ Curt Stokes

Curt Stokes

The Empire District Electric Company
 EO-2022-0193
 Missouri Asbury Securitization
 Asbury Securitization Costs

Line No.	Description	STAFF REBUTTAL		LIBERTY DIRECT		OPC REBUTTAL	
		Total Missouri	Asbury (Retired Plant) Proposed ER-2022-0193	Total Missouri	Asbury (Retired Plant) Proposed ER-2022-0193	Total Missouri	Asbury (Retired Plant) Proposed ER-2022-0193
1	Net Retired Asbury Plant	\$	159,414,474	\$	159,414,474	\$	139,838,566
2	Asbury Environmental Regulatory Assets		1,494,657		1,494,657		-
3	Asbury Fuel Inventories		1,532,832		1,532,832		(3,947,465)
4	Asbury Excess ADIT		(12,313,459)		(12,177,195)		(16,934,393)
5	Asbury AAO Liability		(75,779,097)		(41,677,324)		(116,646,983)
6	Asbury ADIT		(17,134,363)		(4,747,535)		(32,275,034)
7	Additional Asbury Decommissioning Costs (Phase 2)		3,541,054		3,541,054		3,541,054
8	Additional Asbury Decommissioning Costs (Phase 3)		3,364,002		7,436,214		3,364,140
9	Additional Asbury Asset Retirement Obligation Costs - Asbestos		-		2,807,540		-
10	Additional Asbury Asset Retirement Obligation Costs - CCR Impoundment		-		18,473,530		-
11	Total Asbury Costs:	\$	64,120,100	\$	136,098,247	\$	(23,060,115)
	Carrying charges		1,987,723		5,634,267		(1,183,380)
	Up front Financing Costs		2,890,269		3,287,122		
	Total Asbury Costs to Securitize:	\$	68,998,092	\$	145,019,636	\$	(24,243,495)

Prepared by: Amanda McMellen

The Empire District Electric Company
EO-2022-0193
Missouri Asbury Securitization
Asbury AAO Liability

Line No.	FERC (a)	GL Account (b)	Description (c)	Reference (d)	STAFF REBUTTAL	LIBERTY DIRECT	OPC REBUTTAL
					Total Missouri AAO Compliance Jan 2020 - Apr 2022 (f)	Total Missouri AAO Compliance Jan 2020 - Apr 2022 (g)	Total Missouri AAO Pro Forma Jan 2020 - May 2022
ASBURY AAO LIABILITY							
1			Plant In Service		\$ (217,663,073)	\$ -	\$ (217,663,073)
2			Remaining Plant		(2,153,637)	-	-
3			Accumulated Depreciation		62,618,776	-	62,618,776
4			Remaining Plant Accumulated Depreciation		(227,285)	-	-
5			Fuel Inventories		(2,414,632)	-	-
6			Cash Working Capital		128,938	-	-
7			ADIT		(63,372)	-	52,536,441
8			Excess ADIT		1,135,377	-	-
9			Total Net Rate Base		(158,638,908)	-	(102,507,856)
10			ROR				
11			Return On Asbury		(23,276,429)	-	(17,320,069)
12			Revenue From Scrap Value or Value of Items Sold		(10,277)	(10,277)	(10,248)
13			Any Fuel or SPP Revenues/Expenses not flowed through FAC		-	-	-
14			Depreciation Expense		(24,349,929)	(22,610,648)	(26,257,905)
15			All Non-Fuel/Non-Labor Operating & Maintenance Expenses		(9,369,524)	(8,711,945)	(9,555,759)
16			Labor Expenses		-	-	(6,988,710)
17			Property Taxes		(4,643,628)	(4,345,040)	(8,580,012)
18			Non-Labor Asbury Retirement/Decommissioning Costs		3,936,502	3,936,502	-
			Return on Coal Inventory		-	-	(666,977)
			Fed/State Income Tax on Asbury and Coal Profit		-	-	(2,956,013)
			Tax on Abandonement		-	-	(16,504,355)
19			Asbury AAO Liability Before Gross Up:		(57,713,284)	(31,741,408)	(88,840,048)
20			Gross Revenue Conversion Factor		1.3130 (18,065,812.45)	1.3130 (9,935,916)	1.3130 (27,806,935)
21	254	254124	Total Asbury AAO Liability:		\$ (75,779,097)	\$ (41,677,324)	\$ (116,646,983)