

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

In the Matter of The Empire District	)	
Gas Company d/b/a Liberty's	)	
Purchased Gas Adjustment Tariff	)	<b><u>Case No. GR-2024-0150</u></b>
Filing	)	Tariff No. JG-2024-0058

**STAFF RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission and for its Recommendation, states as follows:

1. On November 3, 2023, The Empire District Gas Company d/b/a Liberty ("Empire") filed revised tariff sheets bearing an effective date of December 3, 2023, Tariff File No. JG-2024-0058, and an accompanying cover letter with supporting worksheets. The tariff sheets were filed to reflect changes in Empire's Regular Purchased Gas Adjustment ("RPGA") factors as a result of estimated changes in the cost of natural gas. Also included in this filing is the annual change to the Actual Cost Adjustment ("ACA").

2. The Commission issued an order on November 7, 2023, directing Staff to file a recommendation regarding Empire's request and corresponding tariff sheets, Tariff File No. JG-2024-0058, no later than November 16, 2023.

3. Staff has reviewed Empire's filings and determined that the rates in the proposed tariff sheets, Tariff No. JG-2024-0058, were calculated in conformance with Empire's PGA Clause.

4. Due to the limited time available to review the documentation supporting the ACA factors Empire submitted in this filing, Staff recommends the Commission

approve the tariff sheets in Tariff File No. JG-2024-0058, on an interim basis, subject to refund, for service on and after December 3, 2023.

5. Also, due to the limited time available to review the documentation supporting the ACA factors Empire submitted in this filing, Staff requests the Commission order Staff to submit its results and recommendations regarding the information in this ACA filing to the Commission on or before December 16, 2024.

**WHEREFORE**, for the foregoing reasons and those stated in Staff's Memorandum attached hereto, Staff recommends that the Commission issue an order approving Empire's tariff sheets filed in Tariff No. JG-2024-0058, on an interim, subject to refund status; and further order Staff to file its recommendation Empire's ACA filing no later than December 16, 2024.

Respectfully submitted,

**/s/ J. Scott Stacey**

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**ATTORNEY FOR STAFF OF THE  
PUBLIC SERVICE COMMISSION**

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record this 14<sup>th</sup> day of November, 2023.

**/s/ J. Scott Stacey**

**MEMORANDUM**

**TO:** Missouri Public Service Commission Official Case File,  
Case No. GR-2024-0150, Tariff No. JG-2024-0058  
The Empire District Gas Company

**FROM:** Michael J. Ensrud, Research/Data Analyst - Procurement Analysis Dept.  
  
*/s/ David M. Sommerer 11/14/2023*  
Financial and Business Analysis Div./Date

**SUBJECT:** Staff Recommendation for Empire District Gas Company Scheduled Winter  
PGA/ACA Filing Effective Date December 3, 2023

**DATE:** November 14, 2023

On November 3, 2023, The Empire District Gas Company, d/b/a Liberty (“Empire” “EDG” or “Company”), filed three tariff sheets bearing a proposed effective date of December 3, 2023. In addition, Empire filed a single page cover letter and supporting worksheets. The purpose of this filing is to implement significant reductions in Liberty’s Purchase Gas Adjustment (PGA) tariffed rates.

The tariff sheets were filed to reflect changes in Empire’s PGA factors as the result of estimated changes in the cost of natural gas for the upcoming winter season and changes in the Actual Cost Adjustment (ACA) factors.

The cover letter makes the following representations about the pending PGA filing:

*“As a result of this filing, for the South service area, the effect of these changes will decrease the firm PGA rate from the current \$1.154290 per Ccf (100 cubic feet) to \$0.82071 per Ccf. For the North service area, the effect of these changes will decrease the firm PGA rate from the current \$1.054620 per Ccf to \$0.59865 per Ccf. For the Northwest service area, the effect of these changes will decrease the firm PGA rate from the current \$1.305140 per Ccf to \$0.34303 per Ccf.”*

The magnitude of the reduction being proposed is as follows:

<b><u>District</u></b>	<b><u>Existing per Ccf</u></b>	<b><u>Proposed per Ccf</u></b>	<b><u>Reduction per Ccf</u></b>
South	\$1.15429	\$0.82071	<b>\$0.33358</b>
North	\$1.05462	\$0.59865	<b>\$0.45597</b>
Northwest	\$1.30514	\$0.34303	<b>\$0.96211</b>

On November 7, 2023, the Commission issued its “***Order Directing Staff Recommendation and Setting Time for Responses***”. The order directs Staff to file its recommendation no later than November 16, 2023.

Case No. GR-2024-0150, under which these changes were filed, was established to track Empire’s natural gas costs to be reviewed in its 2022-2023 ACA filing. These rate changes should be made on an interim basis, subject to refund pending final Commission decisions in ACA Case Nos. GR-2023-0129 (2021-2022 ACA period) and GR-2024-0150 (2022-2023 ACA period). Due to the limited time available to review the documentation supporting the ACA factors submitted in this filing, the Procurement Analysis Department (PAD) requests permission to submit its results and recommendations regarding the information included in this ACA filing to the Commission on or before December 16, 2024.

The Staff has verified that the Company has filed its annual report and is not delinquent on any assessment. Staff has reviewed this filing and is not aware of any issue currently pending before the Commission that affects or is affected by this filing, other than those mentioned above.

Staff has reviewed this filing and determined that the rates on the proposed tariff sheets were calculated in conformance with Empire’s PGA Clause.

Staff recommends that the following tariff sheets, filed on November 3, 2023, be approved on an interim basis, subject to refund.

The Empire proposed effective date is the date – December 3, 2023 – noted on the bottom of the proposed tariff page.

## **RECOMMENDATION**

1. Approve the following tariff sheets as filed on November 3, 2023 and effective on December 3, 2023 on an interim basis, subject to refund:
  - a. P.S.C.MO. No. 2, 20th Revised Sheet No. 62, Cancelling 19<sup>th</sup> Revised Sheet No. 62;
  - b. P.S.C. MO. No. 2, 20th Revised Sheet No. 63; Canceling 19<sup>th</sup> Revised Sheet No. 63
  - c. P.S.C. MO. No. 2, 20th Revised Sheet No. 65: Canceling 19<sup>th</sup> Revised Sheet No. 65.

