

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

In the Matter of the Application of The Empire)
District Gas Company d/b/a Liberty Utilities or)
Liberty for an Order Granting Billing Variances) Case No. GE-2024-0201
Related to the Company’s Implementation of its)
Customer First Program)

UPDATE REGARDING APPLICATION FOR TEMPORARY VARIANCES

COMES NOW The Empire District Gas Company d/b/a Liberty (“EDG” or “Liberty”) and provides this update regarding its Application for Temporary Variances, Request for Waivers, and Motion for Expedited Treatment filed herein on December 28, 2023.

1. The initial application stated that EDG would be implementing Customer First on February 12, 2024, and requested temporary rule variances for the months of February and March 2024.

2. To help ensure a smooth transition, Liberty has postponed the implementation date. At this time, it appears EDG will implement Customer First on April 8, 2024, and requests that the temporary rule variances be granted for the month of implementation and the following month (likely April and May 2024).

3. As set forth in the initial application, Liberty intends to take the following steps to lessen any discomfort or financial burden that could be caused by its process changes: (a) waive any late fees for customers who need more time to pay and grant more time to any customer who requests a later date; (b) suspend any collection activities for all customers during this transition; (c) send letters and conduct other outreach efforts to inform customers regarding changes due to this system transition, including changes to their billing; and (d) if a customer wishes to enroll in budget billing, calibrate the budget billing installment amount based on the usual 12-month usage history.

4. On January 30, 2024, the Staff of the Commission filed its recommendation regarding EDG's initial application. Staff recommends that the Commission grant the requested variances with the same conditions imposed in Case No. GE-2024-0046 (variance application of Liberty Utilities (Midstates Natural Gas) Corp.), plus on additional condition requiring an update to be filed herein 90 days after the transition. Liberty does not object to the imposition of this additional condition.

WHEREFORE, Liberty respectfully requests, for good cause shown, that the Commission grant its Application for Temporary Variances, Request for Waivers, and Motion for Expedited Treatment, waiving the prefiling notice requirement of 20 CSR 4240-4.017(1), granting the requested temporary billing variances from 20 CSR 4240-13.015(1)(C) and 20 CSR 4240-13.020(6), waiving the newspaper requirement of 20 CSR 4240-13.065(2), and issuing its order on an expedited basis.

Respectfully submitted,

/s/ Diana C. Carter

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CERTIFICATE OF SERVICE

I hereby certify that the above document was filed in EFIS on this 12th day of February, 2024, and sent by electronic transmission to the Staff of the Commission and the Office of the Public Counsel.

/s/ Diana C. Carter