



**The Empire District Electric Company**

**A Liberty Utilities Company**

Case No. ER-2019-0374

OPC Data Request – 1002

Data Request Received: 11/26/19

Request No. 1002

Date of Response: 12/16/19

Respondent: Jill Schwartz

Submitted by: Robert Schallenberg

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**REQUEST:**

Is EDE in compliance with the Commission's affiliate rules 20 CSR 4240-20.015 (4) (C)? If yes, please provide a listing of the documents EDE creates and maintains to satisfy this requirement for the test year, update, and true-up periods.

**RESPONSE:**

Yes, The Empire District Electric Company ("EDE") is in compliance with 20 CSR 4240-20.015 (4) (C) – Affiliate Transactions Record Keeping Requirements. EDE and its affiliates maintain separate books and records for affiliate transactions in accordance with the Commission's rules and the Algonquin Power & Utilities Corp. Cost Allocation Manual and its appendices ("CAM").

Specifically, EDE collects the number of accounts payable items, number of pole attachments, building/land lease footages & the warehouse square foot rate, number of bills, number of phones, number of purchase requisitions, number of 2-way radios, number of computers, and vehicle hours driven which are applied in accordance with the CAM at the fully distributed cost ("FDC"), except for the land lease for fiber huts which is at market rate for warehouse space per square foot. The CAM is the primary document and the data is pulled from the GL to apply the allocation rates from the CAM.