

In the Matter of The Empire District Electric)
Company's Request for Variances Related to) Case No. EE-2024-_____
Automated Metering Infrastructure)

3. The Company implemented Advanced Metering Infrastructure (“AMI”). AMI provides numerous customer advantages, including allowing for remote connections and disconnections. Current Commission rules and Liberty’s tariff, however, require in-person

interactions as part of the disconnection process. Specifically, Commission Rule 20 CSR 4240-13.050(9) provides that “immediately preceding the discontinuance of service, [the employee of the utility] . . . shall make a reasonable effort to contact and identify him/herself to the customer or a responsible person then upon the premises and shall announce the purpose of his/her presence. The rule further provides that when “service is discontinued, the employee shall leave a notice upon the premises in a manner conspicuous to the customer that service has been discontinued and the address and telephone number of the utility where the customer may arrange to have service restored.”

4. The Company intends to file an application for a waiver from the above regulation and possibly other provisions of 20 CSR 4240-13 related to the full utilization of AMI. The issues likely to be before the Commission are those outlined in Chapter 13 and the Company’s tariffs with regard to customer notice and remote connection and disconnection and other associated issues that may be contested by others.

5. With regard to Rule 4.017(1) and the requirement that a 60-day filing notice include “a summary of all communication regarding substantive issues likely to be in the case between the filing party and the office of the commission that occurred in the ninety (90) days prior to filing the notice,” Liberty verifies that there have been no ex parte communications regarding substantive issues likely to be in the intended case between Liberty and the office of the Commission within the 90 days prior to the filing of this Notice.

WHEREFORE, the Company submits to the Commission and its Secretary this Notice of Intended Case Filing.

Respectfully submitted,

/s/ Diana C. Carter
Diana C. Carter MBE #50527

The Empire District Electric Company d/b/a Liberty
428 E. Capitol Ave., Suite 303
Jefferson City, Missouri 65101
Joplin Office Phone: (417) 626-5976
Cell Phone: (573) 289-1961
E-Mail: Diana.Carter@LibertyUtilities.com

/s/ Jermaine Grubbs
Jermaine Grubbs MBE #68970
602 S. Joplin Ave.
Joplin, Missouri 64801
Cell Phone: (417) 317-9024
E-Mail: Jermaine.Grubbs@LibertyUtilities.com

CERTIFICATE OF SERVICE

I hereby certify that the above document was filed in EFIS on this 25th day of April, 2024, and sent by electronic transmission to the Staff of the Commission and the Office of the Public Counsel.

/s/ Diana C. Carter