BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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

NOTICE OF INTENDED CASE FILING

COMES NOW The Empire District Electric Company d/b/a Liberty ("Liberty" or the "Company"), and for its Notice of Intended Case Filing being submitted herein pursuant to Commission Rule 20 CSR 4240-4.017, respectfully states as follows to the Missouri Public Service Commission (the "Commission"):

- 1. Liberty is a Kansas corporation with its principal office and place of business at 602 S. Joplin Ave., Joplin, Missouri. Liberty is qualified to conduct business and is conducting business in Missouri, as well as in the states of Arkansas, Kansas, and Oklahoma. The Company is engaged, generally, in the business of generating, purchasing, transmitting, distributing, and selling electricity in portions of the referenced four states. Liberty's Missouri operations are subject to the jurisdiction of the Commission as provided by law.
- 2. Commission Rule 20 CSR 4240-4.017(1) provides, in part, that "(a)ny person that intends to file a case shall file a notice with the secretary of the commission a minimum of sixty (60) days prior to filing such case. Such notice shall detail the type of case and issues likely to be before the commission and shall 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."
- 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

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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