

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

In the Matter of the Request of The Empire)	
District Electric Company d/b/a Liberty for)	<u>Case No. ER-2021-0312</u>
Authority to File Tariffs Increasing Rates for)	Tracking No. JE-2025-0013
Electric Service Provided to Customers in its)	
Missouri Service Area)	

STAFF RECOMMENDATION TO APPROVE TARIFF SHEET

COMES NOW Staff of the Missouri Public Service Commission and hereby respectfully submits this *Staff Recommendation to Approve Tariff Sheet* as follows:

1. On August 1, 2024, The Empire District Electric Company d/b/a Liberty (the “Company”) filed a tariff sheet for the Company’s Renewable Energy Purchase Program (“the Program”), tariff sheet PSC MO No. 6, Section 4, 3rd Revised Sheet No. 7a. The submitted tariff sheet bore a proposed effective date of September 1, 2024, and was assigned Tariff Tracking No. JE-2025-0013.

2. Also on August 1, 2024, the Commission directed Staff to file, no later than August 15, 2024, a recommendation regarding the proposed tariff sheet.

3. As reflected in Staff’s Memorandum attached hereto and incorporated herein by reference, Staff has reviewed the filing and recommends that the Commission issue an order approving the tariff sheet, with an effective date of September 1, 2024.

4. In addition, Staff recommends the Commission order the Company to provide its workpapers, *in Excel format*, along with its quarterly reviews moving forward.

WHEREFORE, Staff recommends that the Commission issue an order (1) approving the following tariff sheet filed by the Company on August 1, 2024, with an effective date of September 1, 2024, and (2) ordering the Company to provide its workpapers in Excel format along with its quarterly reviews moving forward:

Respectfully submitted,

/s/ Jeffrey A. Keevil

Jeffrey A. Keevil

Missouri Bar No. 33825

P. O. Box 360

Jefferson City, MO 65102

(573) 526-4887 (Telephone)

(573) 751-9285 (Fax)

Email: jeff.keevil@psc.mo.gov

Attorney for the Staff of the
Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 15th day of August 2024.

/s/ Jeffrey A. Keevil

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
In the Matter of the Request of Empire District Electric Company d/b/a
Liberty for Authority to File Tariffs Increasing Rates for Electric Service
Provided to Customers in its Missouri Service Area
Case Number: ER-2021-0312

FROM: Malachi Bowman
Associate Engineer, Engineering Analysis Department

/s/ Malachi Bowman 08/12/2024
Staff Member / Date

SUBJECT: Renewable Energy Purchase Plan

DATE: August 15, 2024

EXECUTIVE SUMMARY

On August 1, 2024, The Empire District Electric Company d/b/a Liberty (“Company”), submitted a revised tariff sheet for the Company’s Renewable Energy Purchase Program (“Program”), tariff sheet PSC MO No. 6, Section 4, 3rd Revised Sheet No. 7a with an effective date of September 1, 2024.

On August 1, 2024, the Commission filed its Order Directing A Staff Recommendation about Liberty’s Tariff Revision and Setting Time for Comments, ordering Staff to file its recommendation on the tariff sheet,¹ no later than August 15, 2024.

BACKGROUND

The Company proposed its Renewable Energy Purchase Plan as part of its 2021 rate case.² The purpose of the Program is to offer non-residential customers the opportunity to offset their carbon emissions by up to 100% of their electricity consumption through the purchase of renewable energy credits (“RECs”). The Program was approved and placed into effect June 1, 2022. The tariff that was placed into effect contains language requiring the Company to periodically review the REC rate:

On a quarterly basis, the Company shall perform a review of the previous three months’ average weighted price (“Quarterly Review”) for the Company’s REC sales to the schedule’s REC Rate. If the REC Rate is outside a five percent threshold as compared to the Quarterly Review, the REC Rate will be recalculated as the weighted average price for the most recent 12-month ending period. This updated REC Rate shall become effective with the first billing cycle of the following month.

¹ JE-2025-0013

² ER-2021-0312

STAFF REVIEW

The tariff sheet updates the REC rate, previously set at \$2.21 per 1,000 kWh, to reflect the Renewable Energy Credits (“RECs”) rate of \$2.52 per 1,000 kWh for the 12-month period ending June 2024. Staff has reviewed the workpapers provided by the Company and agrees that \$2.52 is the weighted average for the 12-month period ending June 2024.

Per the Company’s tariff, the REC rate is up for review on a quarterly basis. In its March 7, 2024, recommendation Staff recommended the Commission order the Company to provide its quarterly reviews to Staff moving forward. Additionally, Staff believes it would be beneficial if the Company would also provide its workpapers, in excel format, with its quarterly reviews as it would expedite the review process.

STAFF RECOMMENDATION

Staff recommends the Commission approve the following tariff sheet, as filed on August 1, 2024, to go into effect on and after September 1, 2024, the requested effective date:

PSC MO No. 6, Section 4

3rd Revised Sheet No. 7a Canceling 2nd Revised Sheet No. 7a

Staff further recommends the Commission to order the Company to provide its workpapers, in excel format, with its quarterly reviews going forward.

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Missouri Service Area)

Case No. ER-2021-0312

AFFIDAVIT OF MALACHI BOWMAN

STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

COMES NOW MALACHI BOWMAN and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation, in Memorandum form*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

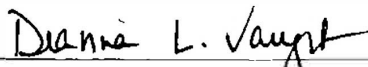


MALACHI BOWMAN

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 14th day of August 2024.

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: July 18, 2027
Commission Number: 15207377



Notary Public