

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

In the Matter of the Empire District Gas)	
Company d/b/a Liberty Filing of its)	<u>Case No. GT-2025-0072</u>
Revised Weather Normalization Adjustment)	Tariff No. JG-2025-0024
Rider (WNAR) Tariff)	

STAFF RECOMMENDATION FOR APPROVAL OF SUBSTITUTE TARIFF SHEET

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Staff Recommendation for Approval of Substitute Tariff Sheet* states as follows:

1. On August 30, 2024, Empire District Gas Company d/b/a Liberty (“Empire”) filed a tariff sheet to revise its weather normalization rider (“WNAR”) rates for its Residential and Small General Service Sales Classes. The tariff sheet has an issue date of August 30, 2024, and an effective date of October 1, 2024, and was assigned Tracking No. JG-2025-0024.

2. On September 4, 2024, the Commission issued an order directing Staff to file a recommendation regarding the tariff sheet no later than September 13, 2024.

3. Staff reviewed the tariff sheet filed by Empire on August 30, 2024, and during Staff’s review of the submitted tariff sheet, JG-2025-0024, and the associated workpapers, Staff determined Empire did not utilize ranked heating days supplied by Staff as required in Empire’s last rate case (GR-2021-0320) and Staff notified Empire of the discrepancy.

4. On September 12, 2024, Empire filed a Substitute Tariff along with the associated workpapers with the Commission.

5. On September 13, 2024, Staff filed *Staff’s Status Report and Motion for Extension of Time to File its Recommendation* with the Commission, and the Commission

granted Staff's Motion and ordered Staff to file its recommendation no later than September 20, 2024.

6. On September 13, 2024, Empire filed an additional Substitute Tariff along with the associated workpapers with the Commission.

7. As further explained in the attached memorandum, Staff has reviewed the tariff sheet filed by Empire on August 30, 2024, September 12, 2024, and on September 13, 2024, and recommends approval of the following substitute tariff filed by Empire on September 13, 2024:

P.S.C. MO. No. 2

Fifth Revised Sheet No. 68 Cancelling Fourth Revised Sheet No. 68

8. The effect of Empire's WNAR tariff sheet filing means that residential customers of Empire's systems who used 100 Ccf¹ of natural gas in a given billing month would see a \$1.87 bill increase from current effective rates. A small general service class customer who used 100 Ccf of natural gas in a given billing month would see a \$1.20 bill increase from current effective rates.

9. Due to the expedited nature of the review, Staff's recommendation is based on a limited review of the application and supporting materials. Staff further recommends the tariff language be revised during the next rate case to allow longer processing time sufficient for all parties.

¹ Ccf stands for one hundred cubic feet of gas.

WHEREFORE, as set forth above and in the attached memorandum, Staff recommends the Commission issue an order approving the Empire tariff sheet (Tracking No. JG-2025-0024), or allow the tariff sheet to go into effect by operation of law for service on or after October 1, 2024.

Respectfully submitted,

/s/ J. Scott Stacey

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**ATTORNEY FOR STAFF OF THE
PUBLIC SERVICE COMMISSION**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record this 18th day of September, 2024.

/s/ J. Scott Stacey

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. GT-2025-0072, Tariff Tracking No. JG-2025-0024
The Empire District Gas Company d/b/a Liberty

FROM: Michael D. Irwin, Senior Research/Data Analyst
Water, Sewer, Gas, and Steam Department

/s/ Michael D. Irwin / 09-18-2024
Senior Research/Data Analyst / Date

SUBJECT: Staff Recommendation for the **Approval** of the Revised Tariff Sheet Filed by The Empire District Gas Company to reflect its Weather Normalization Adjustment Rider (WNAR) to go into effect on October 1, 2024.

DATE: September 18, 2024

On August 30, 2024, The Empire District Gas Company d/b/a Liberty (“Empire”) filed a tariff sheet designed to reflect the annual adjustment made pursuant to the Company’s Weather Normalization Adjustment Rider (“WNAR”) with a requested effective date of October 1, 2024. On September 4, 2024, the Commission directed Staff to file a recommendation regarding the WNAR Tariff Sheet in Tariff Tracking No. JG-2025-0024 no later than September 13, 2024. During review of the tariff sheet and associated workpapers, Staff determined Empire did not utilize ranked heating days supplied by Staff as required in Empire’s last rate case (GR-2021-0320) and notified Empire of the discrepancy. On September 12, 2024, Empire filed a substitute tariff along with the associated workpapers with the Commission. On September 13, 2024, Staff requested an extension to file a recommendation by September 20, 2024, in order to allow sufficient time to review the substitute tariff and workpapers. On September 13, 2024, Empire filed another substitute tariff to correct a minor error in the substitute tariff filed the previous day. On September 13, 2024, the Commission ordered staff to provide its recommendation by September 20, 2024. Staff, upon review of the substitute tariff and associated workpapers, recommends approval of the substitute tariff sheet in Tracking No. JG-2025-0024.

Empire’s WNAR became effective August 17, 2020. The purpose of the tariff is to reflect the annual adjustment made pursuant to the Empire’s WNAR for the twelve-month period ending September 30, 2025. Empire calculated the rates annually to account for variations in temperature

and is based on the difference between the actual heating degree days and the normalized heating degree days. Empire's current and proposed rates are included in Table 1 below.

Table 1: Current and Proposed WNAR Rates by Class.

Class	WNA Rider Rate	
	Current	Proposed
Residential	\$0.01632/Ccf	\$0.03506/Ccf
Small General Service Sales	\$0.01896/Ccf	\$0.03099/Ccf

Based on weather variations in Liberty's service districts, proposed residential rates and the small general service class rates for the Empire district service areas will increase customer bills. This means a residential customer that used 100 Ccf of natural gas in a given billing month would see an approximate \$1.87 increase in their bill from the currently effective WNAR rate. Likewise, a small general service class customer in the using 100 Ccf of gas would see an approximate \$1.20 increase in their bill from the currently effective WNAR rate.

Staff Recommendation

Staff has reviewed the following tariff sheet, and recommends approval of the following tariff sheet, as filed on September 13, 2024, and to go into effect for service on and after October 1, 2024, the requested effective date:

P.S.C. MO. No. 2

5th Revised Sheet No. 68 Cancelling 4th Revised Sheet No. 68

Staff has verified The Empire District Gas Company Utilities has filed its Annual Report. Staff is not aware of any other matter pending before the before the Commission that affects or is affected by this tariff filing.

Due to the expedited nature of the review, Staff's recommendation is based on a limited review of the application and supporting materials. Staff recommends the tariff language be revised during the next rate case to allow a longer processing time sufficient for all parties.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of The Empire District Gas) **File No. GT-2025-0072**
Company d/b/a Liberty (Empire) for the)
Filing of its Revised Weather Normalization) **Tariff No. JG-2025-0024**
Rider (WNAR) Tariff)

AFFIDAVIT OF MICHAEL D. IRWIN

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

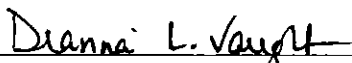
COMES NOW, MICHAEL D. IRWIN, and on his oath declares that he is of sound mind and lawful age; that he contributed to the attached *Staff Recommendation in Memorandum form*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.


MICHAEL D. IRWIN

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 17th day of September 2024.


Notary Public

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