



February 3, 2025

***VIA ELECTRONIC FILING***

Ms. Nancy Dippell, Secretary  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

**RE: The Empire District Electric Company d/b/a Liberty  
Substitute Tariff Sheets Filing – Case No. ER-2024-0261**

Dear Judge Dippell:

Liberty initiated this general rate proceeding on November 6, 2024, by filing direct testimony and revised tariff sheets with a requested effective date thirty days after filing. By Commission order issued November 14, 2024, those tariff sheets were suspended until October 5, 2025.

An inquiry was made by a party regarding the presentation of the amount of the requested rate increase. To address this matter, Liberty is filing the following substitute tariff sheets:

MO P.S.C Mo No. 6	Sec 1	2 <sup>nd</sup> Revised	Sheet No. 1	NS-RG
MO P.S.C Mo No. 6	Sec 1	2 <sup>nd</sup> Revised	Sheet No. 2	TC-RG
MO P.S.C Mo No. 6	Sec 1	2 <sup>nd</sup> Revised	Sheet No. 3	TP-RG
MO P.S.C Mo No. 6	Sec 2	2 <sup>nd</sup> Revised	Sheet No. 1	NS-GS
MO P.S.C Mo No. 6	Sec 2	2 <sup>nd</sup> Revised	Sheet No. 2	TC-GS
MO P.S.C Mo No. 6	Sec 2	2 <sup>nd</sup> Revised	Sheet No. 3	TP-GS
MO P.S.C Mo No. 6	Sec 2	2 <sup>nd</sup> Revised	Sheet No. 4	NS-LG
MO P.S.C Mo No. 6	Sec 2	2 <sup>nd</sup> Revised	Sheet No. 5	TC-LG
MO P.S.C Mo No. 6	Sec 2	2 <sup>nd</sup> Revised	Sheet No. 6	NS-SP
MO P.S.C Mo No. 6	Sec 2	2 <sup>nd</sup> Revised	Sheet No. 7	TC-SP
MO P.S.C Mo No. 6	Sec 2	2 <sup>nd</sup> Revised	Sheet No. 8	LP
MO P.S.C Mo No. 6	Sec 2	2 <sup>nd</sup> Revised	Sheet No. 9	TS
MO P.S.C Mo No. 6	Sec 3	2 <sup>nd</sup> Revised	Sheet No. 1	SPL
MO P.S.C Mo No. 6	Sec 3	2 <sup>nd</sup> Revised	Sheet No. 2	PL
MO P.S.C Mo No. 6	Sec 3	2 <sup>nd</sup> Revised	Sheet No. 3	LS
MO P.S.C Mo No. 6	Sec 3	2 <sup>nd</sup> Revised	Sheet No. 4	MS
MO P.S.C Mo No. 6	Sec 3	1 <sup>st</sup> Revised	Sheet No. 6	SPL-LED
MO P.S.C Mo No. 6	Sec 3	2 <sup>nd</sup> Revised	Sheet No. 10	RG-SCPP
MO P.S.C Mo No. 6	Sec 3	2 <sup>nd</sup> Revised	Sheet No. 11	RCPP

MO P.S.C Mo No. 6 Sec 3	2 <sup>nd</sup> Revised	Sheet No. 12 CEPP
MO P.S.C Mo No. 6 Sec 3	2 <sup>nd</sup> Revised	Sheet No. 13 ESBPP
MO P.S.C Mo No. 6 Sec 4	4 <sup>th</sup> Revised	Sheet No. 25c CSPP

As substitutes, these sheets continue to bear an issue date of November 6, 2024, and an effective date thirty days thereafter (although they are suspended until October 5, 2025).

With its direct filing, the Company proposes to rebase its net fuel and purchase power (“F&PP”) costs it has recovered through its current Fuel Adjustment Clause (“FAC”) and its revenue recovered through its Energy Efficiency Cost Recovery “EECR” rate. When considering the rebasing of the FAC and EECR revenues in the amount of \$(60,718,585), the net additional operating revenue increase is \$92,136,624. The revised rate schedules are designed, in total, to increase Liberty’s gross annual electric base rate revenues by approximately \$152,855,209 million, exclusive of applicable gross receipts, sales, franchise, or occupational fees or taxes, or a 30.10% increase over current base rate electric service revenues. For an average residential customer using 1,000 kWh, the requested rate change, including the rebasing of F&PP and EECR costs, will increase the bill from \$167.40 to \$198.68, or approximately 18.69 percent.

Please do not hesitate to contact me with any questions or concerns regarding this substitute tariff sheets filing.

Sincerely,

*Dianna Carter*



November 6, 2024

**VIA ELECTRONIC FILING**

Ms. Nancy Dippell, Secretary  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

**RE: The Empire District Electric Company d/b/a Liberty  
General Rate Case Filing – Case No. ER-2024-0261**

Dear Judge Dippell:

I am providing to the Commission for filing, in electronic form, certain tariff sheets consisting of revised rate schedules which are designed, in total, to increase The Empire District Electric Company d/b/a Liberty’s (“Liberty” or “Company”) gross annual electric revenues by approximately \$92,136,624 million, exclusive of applicable gross receipts, sales, franchise, or occupational fees or taxes, or a 15.99% increase over current base rate electric service revenues. For an average residential customer using 1,000 kWh, the requested rate change will increase the bill from \$161.09 to \$191.93, or approximately 19.15 percent. The Company also seeks continuation of its Fuel Adjustment Clause with modifications. The specific tariff sheets being submitted are shown on the attached and bear an issue date of November 6, 2024, and an effective date thirty days thereafter.

In accordance with Commission Rule 20 CSR 4240-2.065(1), also being provided in electronic form are the verified direct testimonies of the following Liberty witnesses:

<b>Witness</b>	<b>Topics</b>
Tim Wilson, Central Region President - Electric	Policy, Summary of Rate Changes, Introduction of Witnesses
Dmitry Balashov, Senior Director, Grid Modernization	Study Updates, EV Program Update, Smart Grid Grant Update
Brian Berkstresser, Central Region Senior Director of Generation Operations	Generation Investments
Daniel S. Dane, Consultant	Capital Structure, ROE, Cost of Debt
Aaron J. Doll, Senior Director of Energy Strategy	FAC Transmission Inclusion
Shawn Eck, Director of IT Security, Risk and Compliance	Cyber-Security Programs
Charlotte T. Emery, Senior Director of Rates and Regulatory Affairs	Revenue Requirement, Rate Base, Income and Expense Adjustments, Trackers

James A. Fallert, Consultant	Pension, OPEB
Eric Fox, Consultant	Weather Normalization
Nathaniel W. Hackney, Senior Reporting and Systems Analyst	Low-Income Programs
Candice Kelly, Manager, Customer Service	Customer Service/Billing
Timothy S. Lyons, Consultant	CCOS, CWC
Leigha Palumbo, Senior Manager of Rates and Regulatory Affairs	General Rate Case and FAC MFRs
Colin Penny, Chief Information Officer	Customer First
John J. Reed, Consultant	FAC Shareholder Split
Shaen T. Rooney, Director of Strategic Projects	Asbury Decommissioning
Jill Schwartz, Senior Director of Regulatory Policy and Strategy	CAM, Affiliate Transactions
Todd W. Tarter, Senior Manager of Strategic Planning	Fuel Adjustment Base Factor
Jeffrey Westfall, Vice President, Technical Services - Electric	Transmission and Distribution Investments
Michael McCuen, Director – U.S. Tax Planning & Strategy	Excess ADIT

The Company last implemented a base rate increase on June 1, 2022, based on a test period ending June 30, 2021. Since that time, the Company has made significant investments to serve its customers, necessitating this request. The Company undertook transmission and distribution enhancements to upgrade 18 substations and rebuilt 5 substations for improved reliability, increased capacity, and alternate switching schematics. To accompany the substation improvements, approximately 80 miles of transmission lines were reconducted with approximately 30 miles of newly constructed transmission lines. Additionally, the Company sectionalized 7 distribution circuits, reinforced or replaced 2,296 poles, and added wildlife guards to 5,100 devices and 14 substations. In addition, we have replaced our backbone information technology systems and increased cybersecurity protection of our assets.

The remaining information required by Commission Rule 20 CSR 4240-3.030(3)(B) is being filed herein as part of the direct testimony of Liberty witness Leigha Palumbo, including:

1. the amount of dollars of the aggregate annual increase and percentage of increase over current revenues;
2. names of counties and communities affected;
3. the number of customers to be affected in each general category of service and for all rate classifications within each general category of service;
4. the average change requested in dollars and percentage change from current rates for each general category of service and for all rate classifications;
5. the proposed annual aggregate change by general categories of service and by rate classifications, including dollar amounts and percentage change in revenues;
6. any press releases relative to the filing; and
7. a summary of the reasons for the proposed schedule changes.

Please note that portions of this general rate case filing have been designated as Confidential in accordance with Commission Rule 20 CSR 4240-2.135(2)(A) and Highly Confidential in accordance with Commission Rule 20 CSR 4240-2.135(4) and the protective order issued herein.

Also included with this letter is a verification as required by 20 CSR 4240-22.080(18) and Section 393.1650(3), RSMo.

Please do not hesitate to contact me with any questions or concerns, and please bring these filings to the attention of the Commissioners and the appropriate Commission personnel.

Sincerely,

*Diana Carter*

Enclosures

cc: Jermaine Grubbs  
The Office of the Public Counsel  
Counsel for the Staff of the Commission

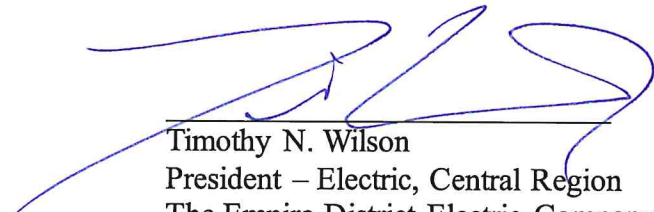
## REVISED TARIFFS

MO P.S.C. Mo No. 6	Sec A	3rd Revised	Sheet No. 1	TOC
MO P.S.C. Mo No. 6	Sec 1	2nd Revised	Sheet No. 1	NS-RG
MO P.S.C. Mo No. 6	Sec 1	2nd Revised	Sheet No. 2	TC-RG
MO P.S.C. Mo No. 6	Sec 1	2nd Revised	Sheet No. 3	TP-RG
MO P.S.C. Mo No. 6	Sec 2	2nd Revised	Sheet No. 1	NS-GS
MO P.S.C. Mo No. 6	Sec 2	2nd Revised	Sheet No. 2	TC-GS
MO P.S.C. Mo No. 6	Sec 2	2nd Revised	Sheet No. 3	TP-GS
MO P.S.C. Mo No. 6	Sec 2	2nd Revised	Sheet No. 4	NS-LG
MO P.S.C. Mo No. 6	Sec 2	2nd Revised	Sheet No. 5	TC-LG
MO P.S.C. Mo No. 6	Sec 2	2nd Revised	Sheet No. 6	NS-SP
MO P.S.C. Mo No. 6	Sec 2	2nd Revised	Sheet No. 7	TC-SP
MO P.S.C. Mo No. 6	Sec 2	2nd Revised	Sheet No. 8	LP
MO P.S.C. Mo No. 6	Sec 2	2nd Revised	Sheet No. 9	TS
MO P.S.C. Mo No. 6	Sec 3	2nd Revised	Sheet No. 1	SPL
MO P.S.C. Mo No. 6	Sec 3	1st Revised	Sheet No. 1b	Reserved
MO P.S.C. Mo No. 6	Sec 3	1st Revised	Sheet No. 1c	Reserved
MO P.S.C. Mo No. 6	Sec 3	2nd Revised	Sheet No. 2	PL
MO P.S.C. Mo No. 6	Sec 3	2nd Revised	Sheet No. 3	LS
MO P.S.C. Mo No. 6	Sec 3	2nd Revised	Sheet No. 4	MS
MO P.S.C. Mo No. 6	Sec 3	1st Revised	Sheet No. 6	SPL-LED
MO P.S.C. Mo No. 6	Sec 3	2nd Revised	Sheet No. 10	RG-SCPP
MO P.S.C. Mo No. 6	Sec 3	2nd Revised	Sheet No. 11	RCPP
MO P.S.C. Mo No. 6	Sec 3	2nd Revised	Sheet No. 11a	RCPP
MO P.S.C. Mo No. 6	Sec 3	2nd Revised	Sheet No. 11b	RCPP
MO P.S.C. Mo No. 6	Sec 3	2nd Revised	Sheet No. 12	CEPP
MO P.S.C. Mo No. 6	Sec 3	2nd Revised	Sheet No. 12a	CEPP
MO P.S.C. Mo No. 6	Sec 3	2nd Revised	Sheet No. 12b	CEPP
MO P.S.C. Mo No. 6	Sec 3	2nd Revised	Sheet No. 12c	CEPP
MO P.S.C. Mo No. 6	Sec 3	2nd Revised	Sheet No. 13	ESBPP
MO P.S.C. Mo No. 6	Sec 3	2nd Revised	Sheet No. 13a	ESBPP
MO P.S.C. Mo No. 6	Sec 3	2nd Revised	Sheet No. 13b	ESBPP
MO P.S.C. Mo No. 6	Sec 4	1st Revised	Sheet No. 4	IR
MO P.S.C. Mo No. 6	Sec 4	1st Revised	Sheet No. 4b	IR
MO P.S.C. Mo No. 6	Sec 4	1st Revised	Sheet No. 5	BBP
MO P.S.C. Mo No. 6	Sec 4	4th Revised	Sheet No. 7a	REP
MO P.S.C. Mo No. 6	Sec 4	2nd Revised	Sheet No. 17i	FAC
MO P.S.C. Mo No. 6	Sec 4	2nd Revised	Sheet No. 17j	FAC
MO P.S.C. Mo No. 6	Sec 4	2nd Revised	Sheet No. 17k	FAC
MO P.S.C. Mo No. 6	Sec 4	2nd Revised	Sheet No. 17l	FAC
MO P.S.C. Mo No. 6	Sec 4	2nd Revised	Sheet No. 17m	FAC
MO P.S.C. Mo No. 6	Sec 4	2nd Revised	Sheet No. 17n	FAC
MO P.S.C. Mo No. 6	Sec 4	2nd Revised	Sheet No. 17o	FAC
MO P.S.C. Mo No. 6	Sec 4	2nd Revised	Sheet No. 17p	FAC
MO P.S.C. Mo No. 6	Sec 4	9th Revised	Sheet No. 17q	FAC
MO P.S.C. Mo No. 6	Sec 4	1st Revised	Sheet No. 18	OTOU
MO P.S.C. Mo No. 6	Sec 4	2nd Revised	Sheet No. 24	FRESH START PLAN
MO P.S.C. Mo No. 6	Sec 4	4th Revised	Sheet No. 25c	CSPP
MO P.S.C. Mo No. 6	Sec 5	1st Revised	Sheet No. 22	R & R
MO P.S.C. Mo No. 6	Sec 5	1st Revised	Sheet No. 23	R & R

## VERIFICATION

In accordance with 20 CSR 4240-22.080(18), the undersigned states that this base rate adjustment request is substantially consistent with the preferred resource plan specified in the most recent triennial compliance filing made by The Empire District Electric Company d/b/a Liberty (“Liberty”), Case No. EO-2021-0331. It is also substantially consistent with the preferred resource plan submitted in Liberty’s most recent annual update in Case No. EO-2024-0249.

The undersigned further states that Liberty is using a qualification process for the competitive bidding of construction and construction-related services for distribution system projects required by Section 393.1650, RSMo. (2024) for no less than ten percent of the combined external installation expenditures it has made in Missouri for construction and construction-related services for distribution system projects, and that its process conforms with the requirements of Section 393.1650.

  
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Timothy N. Wilson  
President – Electric, Central Region  
The Empire District Electric Company d/b/a Liberty