

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

In the Matter of The Empire District Gas                    )  
Company d/b/a Liberty Purchased Gas                    )        Case No. GR-2023-0129  
Adjustment Tariff Filing                                        )

**LIBERTY’S FURTHER RESPONSE TO STAFF’S RECOMMENDATION**

COMES NOW The Empire District Gas Company d/b/a Liberty (“Liberty” or the “Company”) and submits this *Further Response to Staff’s Recommendation* regarding Liberty’s Purchased Gas Adjustment (“PGA”) Tariff filing. In this regard, Liberty respectfully states as follows to the Missouri Public Service Commission (“Commission”):

1. On November 4, 2022, Liberty submitted its PGA/Actual Cost Adjustment (“ACA”) filing for the 2021-2022 period in the above-captioned matter.

2. On December 8, 2023, the Staff of the Commission (“Staff”) filed a *Staff Recommendation* describing Staff’s examination and investigation of Liberty’s PGA/ACA filing, and determined it was calculated in conformance with the Company’s PGA Clause. However, *Staff’s Recommendation* contained certain issues to which Staff sought Liberty’s response.

3. On December 13, 2023, the Commission issued its *Order Directing Response* directing Liberty to respond to *Staff’s Recommendation*.

4. On January 8, 2024, Liberty filed its *Response to Commission Order* explaining that Liberty accepted Staff’s analysis and all but one of Staff’s recommendations. The only recommendation that Liberty took exception with was the Staff’s proposed adjustment related to carrying costs for the Storm Uri balance. The Company stated, at para. 3: “No adjustment should be made at this time to reflect any change in carrying costs. Liberty will work with Staff to attempt to reach agreement on this issue prior to the Company’s next PGA filing (to be made November, 2024).”

5. Accordingly, Liberty has worked with Staff to reach an agreement on the carrying cost issue, and in order to resolve the issue for the Storm Uri balance only, agrees to calculation of carrying costs using the prime rate less 2%. The corresponding ending balances are reflected in **Attachment A** hereto and incorporated herein.

**WHEREFORE**, Liberty respectfully submits this *Further Response to Staff's Recommendation*, requests an order as soon as practicable be issued to set the Storm Uri balances in light of the resolution of the carrying cost issue, and all such relief as is just and proper under the circumstances.

Respectfully submitted,

/s/ Jermaine Grubbs  
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Attorney for The Empire District Gas  
Company d/b/a Liberty

**CERTIFICATE OF SERVICE**

I hereby certify that the above document was filed in EFIS on this 26th day of November, 2024, and sent by electronic transmission to the Staff of the Commission, the Office of the Public Counsel and counsel for intervenors.

/s/ Jermaine Grubbs\_\_\_\_\_