



The Empire District Electric Company
A Liberty Utilities Company

Case No. ER-2019-0374
OPC Data Request – 1003

Data Request Received: 11/26/19
Request No. 1003

Date of Response: 12/16/2019
Respondent: Jill Schwartz

Submitted by: Robert Schallenberg

REQUEST:

During the test year, update, true-up periods does EDE operate under the APUC CAM? If yes, please explain what EDE affiliate transactions are completed under the APUC CAM. Is it EDE's position that the APUC CAM is fully compliant with the MoPSC affiliate transaction rules?

RESPONSE:

Yes, Liberty-Empire operates under the APUC Cost Allocation Manual and its appendices ("CAM"). As outlined in the CAM, allocated costs can take the form of: direct labor, direct material, direct purchased services and indirect charges.

Yes, it is Liberty-Empire's position that the CAM is in compliance with the MoPSC affiliate transaction rules. To the extent any variance from the rules are required, Liberty-Empire requested a variance in Docket AO-2017-0360 which is currently pending.