

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

In the Matter of the Application of The Empire )  
District Electric Company for an Order ) **Case No. EE-2026-0065**  
Granting Temporary Billing Variances )

In the Matter of the Application of the Empire )  
District Gas Company d/b/a Liberty and Liberty ) **Case No. GE-2026-0066**  
Utilities (Midstates Natural Gas) Corp. for an )  
Order Granting Temporary Billing Variances )

In the Matter of the Application of Liberty )  
Utilities (Missouri Water) LLC for an Order ) **Case No. WE-2026-0067**  
Granting Temporary Billing Variances )

**STAFF RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”), by and through the undersigned counsel, and for its *Staff Recommendation* respectfully states as follows:

1. On September 11, 2025, The Empire District Electric Company (EDE), The Empire District Gas Company (EDG), Liberty Utilities (Missouri Water) LLC (Missouri Water), and Liberty Utilities (Midstates Natural Gas) Corp. (Midstates) (collectively, Liberty) filed an *Application for Temporary Variances, Request for Waiver, and Motion for Expedited Treatment* (Application).

2. The Application requested a waiver of the pre-filing notice requirement of Commission Rule 20 CSR 4240-4.017(1), and six-month temporary variances from Commission Rules 20 CSR 4240-13.020(1) and 13.020(6) to better respond to billing issues. Paragraph 2 of the Application notes that Liberty discussed the billing issues and variances with Staff and the Office of the Public Counsel, and neither party objects to the request.

3. The Commission subsequently issued its *Order Directing Filing* on September 11, 2025, ordering Staff to file a recommendation or alternative pleading regarding Liberty's request no later than September 18, 2025.

4. Staff does not have any objection to Liberty's request. However, to help Staff remain informed about Liberty's handling of the billing issues, Staff respectfully requests the Commission grant Liberty's request, subject to the following conditions.

a. Liberty will report to Staff the following information as part of its monthly meetings, ordered in Case No. WR-2024-0104,<sup>1</sup> concerning Customer Service Billing and Metrics. Liberty will report the progress of the process changes for collective and joint accounts (Conversion). This information will apply to all of the Liberty utilities requesting the aforementioned variances, and the report shall include:

- i. When the Conversion started;
- ii. How many accounts have started the Conversion;
- iii. How many accounts have completed the Conversion;
- iv. How many accounts have not started the Conversion; and
- v. Any known issues caused by the Conversion.
- vi. Liberty will file a report in each variance case when the Conversion is complete.

b. These variances will only apply to collective and joint accounts.

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<sup>1</sup> File No. WR-2024-0104, *In the Matter of the Request of Liberty Utilities (Missouri Water) LLC d/b/a Liberty for Authority to Implement a General Rate Increase for Water and Wastewater Service Provided in its Missouri Service Areas*, Order Approving Stipulation and Agreement, Attachment A, paragraph 21, pgs. 5-6 (EFIS Item 174).

5. Staff shared the conditions above with Liberty, and Liberty indicated that it has no objection to the conditions.

**WHEREFORE** Staff respectfully submits this *Staff Recommendation* for the Commission's information and consideration, and to grant such other and further relief as the Commission considers just and reasonable under the circumstances.

Respectfully submitted,

**/s/ Travis J. Pringle**

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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 all parties and/or counsel of record this 18th day of September 2025.

**/s/ Travis J. Pringle**

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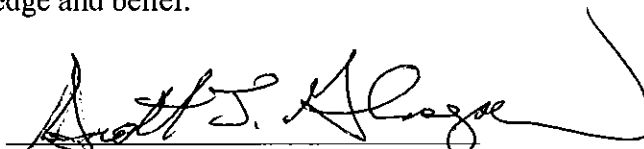
In the Matter of the Application of Liberty ) Case No. WE-2026-0067  
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**AFFIDAVIT OF SCOTT J. GLASGOW**

STATE OF MISSOURI )  
 ) ss.  
COUNTY OF COLE )

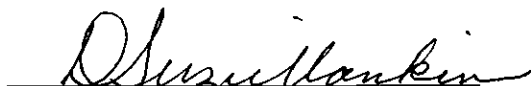
COMES NOW SCOTT J. GLASGOW and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation*; and that the same is true and correct according to his best knowledge and belief.

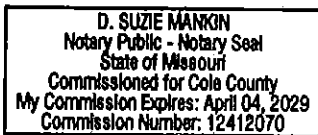
Further the Affiant sayeth not.

  
SCOTT J. GLASGOW

**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 18<sup>th</sup> day of September 2025.

  
Notary Public



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**AFFIDAVIT OF CHARLES TYRONE THOMASON**

STATE OF MISSOURI )  
 ) ss.  
COUNTY OF COLE )

**COMES NOW CHARLES TYRONE THOMASON** and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

*Charles Tyrone Thomason*  
**CHARLES TYRONE THOMASON**

**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 18<sup>th</sup> day of September 2025.

*Dianna L. Vaughn*  
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