

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

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

In the Matter of the Application of The Empire )  
District Gas Company d/b/a 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 )

**ORDER GRANTING APPLICATION FOR TEMPORARY VARIANCES,  
REQUEST FOR WAIVER, AND MOTION FOR EXPEDITED TREATMENT**

Issue Date: September 19, 2025

Effective Date: October 1, 2025

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” or “the Companies”) filed an Application for Temporary Variances, Request for Waiver, and Motion for Expedited Treatment.

Liberty is changing the handling of collective/joint customer billing to improve customer experience, in part, due to the concerns raised by customers and other stakeholders during Liberty’s recent town halls and EDE’s recent rate case public

hearings. To that end, the Companies ask for temporary variances of certain Commission rules.

In particular, Liberty states that one-time adjustments will be necessary that could place certain accounts temporarily outside of the standard billing window (26-35 days). Thus, Liberty seeks a six-month temporary variance from Commission Rule 20 CSR 4240-13.020(1) which, in conjunction with Rule 13.015(1)(C), provides that a billing period shall include usage of not less than 26 days nor more than 35 days.

Also, Liberty is designing targeted customer communications to inform customers about the upcoming improvements so that billing changes are not a surprise. However, these communications may not result in each impacted customer being notified of each billing change at least 15 days prior to the date the customer will receive a bill. Thus, Liberty seeks a six-month temporary variance from Commission Rule 20 CSR 4240-13.020(6) which provides that, when a meter reading route or billing cycle is changed by 9 days or more, notice shall be provided to customers at least 15 days prior to the date a customer will receive a bill based on the new cycle. Liberty represents that Staff and the Office of the Public Counsel do not object to the requests.

The Commission ordered Staff to respond, and allowed other parties an opportunity to respond. Staff filed its Recommendation on September 18, 2025. Staff recommends the Commission approve the Application with certain conditions. Staff indicates Liberty does not object to those conditions. No other responses were received.

Based upon the Application and Staff's Recommendation, the Commission finds it reasonable to approve the Application with Staff's proposed conditions.

Commission Rule 20 CSR 4240-4.017(1)(D) states that the Commission may grant a waiver from the Commission's rule requiring a 60-day notice before filing an application may be granted for good cause. Good cause exists in this case. Liberty has filed a verified declaration that it has had no communication with the office of the Commission within the prior 150 days regarding any substantive issue likely to be raised in this case, other than those pleadings filed for record. Accordingly, for good cause shown, the Commission waives the 60-day notice requirement of Commission Rule 20 CSR 4240-4.017(1).

**THE COMMISSION ORDERS THAT:**

1. The Application is approved, with 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 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

2. Liberty is granted a six-month variance, from the issue date of this order, from Commission Rules 20 CSR 4240-13.020(1) and 20 CSR 4240-13.020(6).

3. Commission Rule 20 CSR 4240-4.017(1) is waived.

4. The Motion for Expedited Treatment is granted.

5. This order shall be effective on October 1, 2025.

6. This case shall be closed on October 2, 2025.



**BY THE COMMISSION**

A handwritten signature in black ink that reads "Nancy Dippell".

Nancy Dippell  
Secretary

Ronald D. Pridgin, Deputy Chief  
Regulatory Law Judge, by delegation  
of authority pursuant to Section 386.240,  
RSMo 2016.

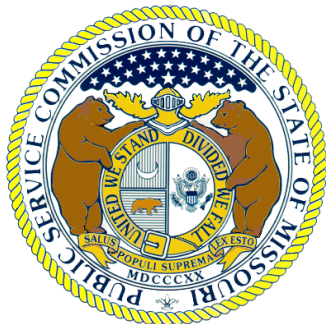
Dated at Jefferson City, Missouri,  
on this 19<sup>th</sup> day of September, 2025.

**STATE OF MISSOURI**

**OFFICE OF THE PUBLIC SERVICE COMMISSION**

**I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.**

**WITNESS my hand and seal of the Public Service Commission, at Jefferson City, Missouri, this 19<sup>th</sup> day of September 2025.**



*Nancy Dippell*  
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**Nancy Dippell**  
**Secretary**

**MISSOURI PUBLIC SERVICE COMMISSION**

**September 19, 2025**

**File/Case No. EE-2026-0065, GE-2026-0066 and WE-2026-0067**

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**Enclosed find a certified copy of an Order or Notice issued in the above-referenced matter(s).**

**Sincerely,**



**Nancy Dippell  
Secretary**

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Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.