

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

In the Matter of the Request of The Empire	)	
District Electric Company d/b/a Liberty for	)	
Authority to File Tariffs Increasing Rates for	)	<b><u>File No. ER-2024-0261</u></b>
Electric Service Provided to Customers In its	)	
Missouri Service Area	)	

**JOINT REQUEST TO LATE-FILE**  
**JOINT STIPULATION OF NON-CONTESTED FACTS**

**COMES NOW**, the Staff of the Missouri Public Service Commission's ("Staff") on behalf of the Parties,<sup>1</sup> respectfully requests that the Missouri Public Service Commission ("Commission") accept the Parties' late filed Joint Stipulation of Non-Contested Facts:

1. On September 26, 2025, the Commission ordered the Parties to file a Stipulation of Facts by September 30, 2025. The Parties did not agree on a joint stipulation in time to file as the Parties were coordinating their efforts to present the Amended List of Issues to the Commission. The Parties filed the Amended List of Issues on September 30, 2025.

2. The Parties are able to Stipulate the following facts in compliance with the Commission's order:

- 1) The Empire District Electric Company d/b/a Liberty ("Liberty" "Empire," or the "Company") is a Kansas corporation with its principal office and place of business at 602 S. Joplin Ave., Joplin, Missouri. Liberty is qualified to conduct business and is conducting business in Missouri, as well as in the states of Arkansas, Kansas, and Oklahoma. The Company is engaged, generally, in the business of generating, purchasing, transmitting, distributing, and selling electricity in portions of the referenced four states.

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<sup>1</sup> The Empire District Electric Company ("Empire"), the Midwest Energy Consumers Group ("MECG"), the Office of the Public Counsel ("OPC"), The Consumers Council of Missouri, Influx Energy, and IBEW Local Union 1474 join Staff in this filing.

- 2) Empire is an “electrical corporation” and a “public utility” as those terms are defined in Section 386.020 RSMo and is subject to the jurisdiction and supervision of the Commission as provided by law. Empire also has a wholly owned subsidiary that is a “gas corporation.”
- 3) As of March 31, 2025, in Missouri, Empire provided electric service approximately 143,000 residential customers, 23,500 commercial customers, 277 industrial customers, 430 Street/Other Lighting, and 1,300 other public authority and street and highway customers.
- 4) Liberty (Empire electric) customers have made 641 informal complaints against Liberty since May 1, 2024.<sup>2</sup>
- 5) The public has made 723 public comments in this case.

3. Staff attempted to contact Renew Missouri (“RenewMo”), and the Empire District Retired Members & Spouses Association, LLC (“EDRA”). However, as of this filing, neither RenewMo nor EDRA responded to either emails or phone calls.

**WHEREFORE**, on behalf of the Parties, Staff respectfully requests the Commission accept the late filed Joint Stipulation of Non-Contested Facts, along with any further relief the Commission deems proper.

Respectfully submitted,

**/s/ Eric Vandergriff**

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<sup>2</sup> 612 complaints and 29 inquiries filed in EFIS since that date.

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or electronically mailed to all parties and/or counsel of record on this 1<sup>st</sup> day of October 2025.

**/s/ Eric Vandergriff**