

## Exhibit No. 128

Staff – Exhibit 128  
Testimony of Randall T. Jennings  
Direct  
File No. ER-2024-0261

*Exhibit No.:*  
*Issue(s):* *Miscellaneous Tariff Issues*  
*Witness:* *Randall Jennings*  
*Sponsoring Party:* *MoPSC Staff*  
*Type of Exhibit:* *Direct Testimony*  
*Case No.:* *ER-2024-0261*  
*Date Testimony Prepared:* *July 21, 2025*

**MISSOURI PUBLIC SERVICE COMMISSION**  
**INDUSTRY ANALYSIS DIVISION**  
**TARIFF/RATE DESIGN DEPARTMENT**

**DIRECT TESTIMONY**  
**OF**  
**RANDALL T. JENNINGS**

**THE EMPIRE DISTRICT ELECTRIC COMPANY,**  
**d/b/a Liberty**

**CASE NO. ER-2024-0261**

*Jefferson City, Missouri*  
*July 21, 2025*



2. Mo. P.S.C. 6, Sec. 3, Sheet 3a does not list the Sec. number in the sheet header and should be completed.

3. As outlined in Case No. ER-2021-0312's *Non-Unanimous Partial Stipulation and Agreement* submitted on January 28, 2022, and approved by the Commission on March 9, 2022:<sup>1</sup>

A. Mo. P.S.C. 6, Sec. 4, Sheet 4: Reference to Total Electric Building ("TEB") and General Power Service ("GP") should be revised to refer to "Small Primary Service" or "Large General Service" as applicable.

B. Mo. P.S.C. 6, Sec. 4, Sheet 8a: Reference to Commercial Service ("CB"), Small Heating Service ("SH"), and Feed Mill and Grain Elevator Service ("PFM") should be revised to "Small General Service" and reference to GP and TEB should be revised to refer to "Small Primary Service" or "Large General Service" as applicable.

C. Mo. P.S.C. 6, Sec. 4, Sheet 18: Reference to Commercial Service or CB and Small Heating Service or SH should be revised to "Small General Service" and reference to General Power Service or GP and Total Electric Building or TEB should be revised to refer to "Small Primary Service" or "Large General Service" as applicable.

D. Mo. P.S.C. 6, Sec. 4, Sheet 22: Reference to GP and TEB should be revised to refer to "Small Primary Service" or "Large General Service" as applicable.

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<sup>1</sup> File ER-2021-0312, Non-Unanimous Partial Stipulation and Agreement.

1 E. Mo. P.S.C. 6, Sec. 4, Sheet 22a: Reference to GP and TEB  
2 should be revised to refer to “Small Primary Service” or “Large  
3 General Service” as applicable.

4 4. Mo. P.S.C. 6, Sec. 4, Sheets 26 through 26e titled “Securitized Utility  
5 Tariff Charge / Rider SUTC – February 2021 Storm & Asbury Costs” were omitted  
6 from the Table of Contents on Mo. P.S.C. 6, Sec. A, Sheet No. 1 and should be added.

7 5. Mo. P.S.C. 6, Sec. 4, Sheets 4 through 4d refer to “Interruptible Service  
8 / Rider IR,” but Mo. P.S.C. 6, Sec. 4, Sheet 4e refers to “Voluntary Interruptible Service  
9 / Rider VIR” which is not listed on the table of contents. Because Sheet 4e is a different  
10 rider, it should be listed on the Table of Contents on Mo. P.S.C. 6, Sec. A, Sheet No. 1.

11 6. Mo. P.S.C. 6, Sec. 4, Sheets 22 through 22b refer to “Economic  
12 Development Rider / Schedule EDR,” but Mo. P.S.C. 6, Sec. 4, Sheets 22c through 22h  
13 refer to “Limited Large Customer Economic Development Rider / Schedule SBEDR”  
14 which is not listed on the table of contents. Because Sheets 22c through 22h is a  
15 different rider, it should be listed on the Table of Contents on Mo. P.S.C. 6, Sec. A,  
16 Sheet No. 1.

17 Q. Does this conclude your direct testimony?

18 A. Yes.

**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 Electric Service Provided to Customers     )  
in Its Missouri Service Area                     )

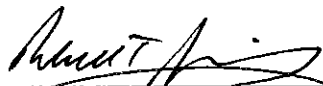
Case No. ER-2024-0261

**AFFIDAVIT OF RANDALL T. JENNINGS**

STATE OF MISSOURI     )  
                                   )  
COUNTY OF COLE     )     ss.

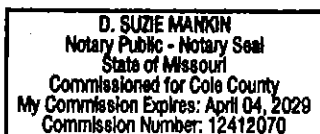
**COMES NOW RANDALL T. JENNINGS** and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Direct Testimony of Randall T. Jennings*; and that the same is true and correct according to his best knowledge and belief.

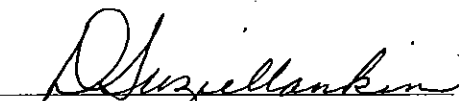
Further the Affiant sayeth not.

  
\_\_\_\_\_  
**RANDALL T. JENNINGS**

**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 15<sup>th</sup> day of July 2025.



  
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Notary Public