# 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

1		DIRECT TESTIMONY OF		
2		RANDALL T. JENNINGS		
3 4		THE EMPIRE DISTRICT ELECTRIC COMPANY, d/b/a Liberty		
5		CASE NO. ER-2024-0261		
6	Q.	Please state your name and business address.		
7	A.	My name is Randall T. Jennings, 200 Madison Street, Jefferson City, MO 65101.		
8	Q.	Are you the same Randall T. Jennings who previously filed testimony in		
9	this case?			
10	A.	Yes, I am.		
11	Miscellaneous Tariff Issues			
12	Q.	What is the purpose of your direct testimony?		
13	A.	The purpose of my direct testimony is to identify items in the current tariff that		
14	are titled or filed incorrectly.			
15	Q.	Does Staff recommend any tariff clean-up for the compliance tariffs in this case?		
16	A.	Yes. Staff examined the currently effective tariff sheets and compared them to		
17	the revised tariff sheets submitted on February 26, 2025. Based on Staff's review, the following			
18	clean-up changes should be made:			
19	1. The following Original tariff sheets were replaced with a "1st Revise			
20	Sheet" but the "Cancelling P.S.C. Mo." information in the sheet header was left blank			
21 and s		hould be completed on the following sheets:		
		Book         Sec.         Sheet No.           6         3         10a           6         3         11c           6         3         12d           6         3         13c		

2. 1 Mo. P.S.C. 6, Sec. 3, Sheet 3a does not list the Sec. number in the sheet 2 header and should be completed. 3 3. As outlined in Case No. ER-2021-0312's Non-Unanimous Partial 4 Stipulation and Agreement submitted on January 28, 2022, and approved by the 5 Commission on March 9, 2022:<sup>1</sup> Mo. P.S.C. 6, Sec. 4, Sheet 4: Reference to Total Electric 6 A. 7 Building ("TEB") and General Power Service ("GP") should be revised to refer to "Small Primary Service" or "Large General 8 9 Service" as applicable. 10 B. Mo. P.S.C. 6, Sec. 4, Sheet 8a: Reference to Commercial Service 11 ("CB"), Small Heating Service ("SH"), and Feed Mill and 12 Grain Elevator Service ("PFM") should be revised to "Small 13 General Service" and reference to GP and TEB should be revised 14 to refer to "Small Primary Service" or "Large General Service" 15 as applicable. 16 C. Mo. P.S.C. 6, Sec. 4, Sheet 18: Reference to Commercial Service 17 or CB and Small Heating Service or SH should be revised to "Small General Service" and reference to General Power Service 18 19 or GP and Total Electric Building or TEB should be revised to refer to "Small Primary Service" or "Large General Service" as 20 21 applicable. 22 Mo. P.S.C. 6, Sec. 4, Sheet 22: Reference to GP and TEB should D. 23 be revised to refer to "Small Primary Service" or "Large General 24 Service" as applicable.

<sup>&</sup>lt;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 R	ANDALL T. JENNINGS
STATE OF MISSOURI ) COUNTY OF COLE )	
	GS and on his oath declares that he is of sound mind going <i>Direct Testimony of Randall T. Jennings</i> ; and his best knowledge and belief.
Further the Affiant sayeth not.	AMDALL T. JENNINGS
J	URAT
Subscribed and sworn before me, a duly of the County of Cole, State of Missouri, at my of July 2025.	constituted and authorized Notary Public, in and for office in Jefferson City, on this/5# day
D. SUZIE MANKIN Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: April 04, 2029 Commission Number: 12412070	Motary Public