

Exhibit No. 129

Staff – Exhibit 129
Testimony of Coty L. King
Direct
File No. ER-2024-0261

Exhibit No.:
Issue(s): *Misc. Tariff Issues –
Engineering*
Witness: *Coty L. King*
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

ENGINEERING ANALYSIS DEPARTMENT

DIRECT TESTIMONY

OF

COTY L. KING

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

CASE NO. ER-2024-0261

*Jefferson City, Missouri
July 2025*

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COTY L. KING

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

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OF

COTY L. KING

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

CASE NO. ER-2024-0261

Q. Please state your name and business address.

A. My name is Coty L. King, and my business address is Missouri Public Service Commission, P. O. Box 360, Jefferson City, Missouri 65102.

Q. By whom are you employed and in what capacity?

A. I am employed by the Missouri Public Service Commission (“Commission”) as a Senior Compliance Analyst in the Engineering Analysis Department, Industry Analysis Division.

Q. Please describe your work and educational background.

A. A copy of my work and educational experience is attached to this testimony as Schedule CLK-d1.

Q. What is the purpose of your direct testimony?

A. The purpose of my testimony is to recommend a change in the non-standard metering charge contained in Empire's Non-Standard Metering Service Tariff and to address concerns with Empire's Emergency Energy Conservation Plan. In addition, I recommend a change in Empire's Authorized service territory in Christian County, Missouri.

NON-STANDARD METERING

Q. Please briefly describe Empire's Non-Standard Metering Service tariff.

A. Empire's Non-Standard Metering Service tariff allows customers to opt-out of using an automated meter reading device.

1 Q. Please briefly describe Empire's current remote meter reading opt-out
2 provisions of its tariff.

3 A. Empire's remote meter reading opt-out provision¹ currently allows residential
4 customers the option of refusing the installation of remotely read metering or requesting the
5 removal of previously installed remotely read metering. In such instances, non-standard
6 metering equipment will be installed that requires a manual meter read. Customers requesting
7 non-standard metering service will be charged a one-time setup charge and a monthly recurring
8 Non-Standard Meter Charge.

9 Q. What is the one-time setup charge and the monthly recurring Non-Standard
10 Meter Charge?

11 A. The initial one-time meter charge is \$150.00. The monthly recurring
12 Non-Standard Meter Charge is \$45.00.

13 Q. What should the one-time setup charge and monthly recurring Non-Standard
14 Meter Charge be?

15 A. Staff recommends Empire establish a one-time setup charge of \$125.00 and the
16 monthly recurring Non-Standard Meter Charge of \$15.00. As the Commission is aware,
17 Senate Bill No. 4 will take effect in August. Although the statute allows Empire to offer its
18 current rates² until July 1, 2026, Staff recommends Empire implement these changes as a result
19 of this case. Staff further notes that the monthly recurring Non-Standard Meter Charge may be

¹ The Empire District Electric Company d.b.a. Liberty P.S.C. Mo. No. 6 Sec. 5 Original Sheet No. 11.

² Senate Bill No. 4 includes a new provision, Section 386.820, and Section 386.820.2(2) provides as follows:
Within a commercially reasonable time after receiving a residential customer's request that an advanced meter be removed from the customer's residence or business, a utility shall remove the advanced meter and replace it at a location of the utility's choice with a traditional meter. A utility may charge a one-time all-inclusive fee, not to exceed one hundred twenty-five dollars, to remove the advanced meter and to provide and install a traditional meter. A utility may charge a monthly fee, not to exceed fifteen dollars, for the use of a traditional meter.

less than \$15.00. However, given the current charge is \$45.00, Staff recommends \$15.00 until Empire has fully evaluated the change or until any necessary rules the Commission may establish are effective.

Q. Do other utilities allow customers to opt-out of non-standard meters?

A. Yes. Electric, gas, and water utilities regulated by this Commission allow customers to opt-out of advanced meters. The table below is a non-exhaustive summary of other advanced meter opt-out rates:

Utility	One-time fee	Monthly fee	Tariff Reference	Effective Date	Case
Evergy Missouri West	\$150	\$45	Sheet R-33.2	12/06/ 2018	JE-2020-0046
Spire Missouri Inc.	\$100	\$30	Sheet 19.2	12/23/2021	YG-2022-0162
Empire Water	\$150	\$45 \$10 (for additional meters)	Section 2, Sheet 6; Section 1, Sheet 3	10/11/2020	AO-2020-0237
Liberty Utilities (Missouri Water)	\$150	\$45 \$10 (for additional meters)	Sheet 5, Sheet 20	9/10/2020	AO-2020-0237
Ameren Missouri	\$100	\$40	Sheet No. 63 Sheet No. 129	6/1/2025 6/1/2025	ER-2024-0319; ER-2024-0319

Note: Empire District Electric, Empire District Water, & Liberty Water tariffs include an additional option of disabling two-way communications. Also, a customer who opts out prior to installation is not assessed the one-time fee. Evergy Missouri West offers a self-read option.

Q. Does Empire allow its customers to self-read their meters?

A. Not at this time. It will be a requirement for all companies to allow a self-read option when Senate Bill No. 4³ takes effect in August.

Q. Do any other companies allow for self-read options for AMI-opt out customers?

³ Senate Bill No. 4 includes a new provision, Section 386.820, and Section 386.820.2(3) provides in part as follows:
(3) If a residential customer utilizes a traditional meter and desires to read its own meter rather than having the utility read the meter, the customer shall report accurate energy usage to the utility on a regular basis. A utility shall provide the customer with the detailed process to report meter readings on a secure website, by telephone, or by other commercially reasonable means.

1 A. Yes. Every Missouri West allows the self-read option for AMI-opt
2 Out customers.⁴

3 Q. How does Every Missouri West's self-read option work?

4 A. Every Missouri West's self-read option works by allowing customers to
5 self-report the usage for each month and Every Missouri West ("EMW") verifies the usage on
6 a semiannual basis. Specifically, EMW's self-read option⁵ states:

7 The Residential Customer shall accurately read and timely report the
8 energy usage monthly. If the Customer fails to provide the meter-
9 reading on time, the Company shall estimate the Customer's energy
10 usage for that month. At least twice a year, at the beginning and end
11 of the summer billing months, the Company shall obtain an actual
12 meter reading of the Customer's energy usage in order to verify the
13 accuracy of readings reported in this manner. If the Customer does
14 not read and report their meter for two (2) consecutive months or any
15 three (3) months in a rolling twelve-month period, the Company may
16 resume monthly readings of the meter.

17 Q. Has the Commission expressed support for a self-read option for remote meter
18 reading opt-out customers?

19 A. Yes. The Commission expressed support for the self-read option offered by
20 Every Missouri West in its Agenda discussion on December 4, 2024.

21 Q. What is Staff's position?

22 A. Staff recommends Empire offer a self-read option, provided certain conditions
23 are included similar to the EMW self-read option presented above. Staff recommends that any
24 allowance for self-reads should include a provision for Empire to return to monthly reads, with
25 applicable charges, if a customer fails to provide accurate and timely self-reads.

⁴ File No. ER-2024-0189, Unanimous Stipulation and Agreement, p. 8, paragraph 11, EFIS Item No. 264.

⁵ Every Missouri West, Inc. d/b/a Every Missouri West P.S.C. Mo. No. 1, 2nd Revised Sheet No. R-33.3.

EMERGENCY ENERGY CONSERVATION PLAN CHANGES

Q. What is Empire's Emergency Energy Conservation Plan tariff, P.S.C. Mo. No. 6, Sec. 5, Original Sheet No. 22?

A. The purpose of Empire's existing Emergency Energy Conservation Plan is to define actions that will be taken when an imminent fuel shortage threatens the ability of Empire to continue services. However, the Emergency Energy Conservation Plan may be implemented unrelated to fuel shortages such as when load shedding needs to occur.

Q. Did Empire propose changes to its Emergency Energy Conservation Plan?

A. Yes, in the direct testimony of Dmitry Balashov.

Q. What is the nature of Empire's proposed changes to its Emergency Energy Conservation Plan?

A. Empire's proposed changes to its Emergency Energy Conservation Plan are more flexible in the types of emergencies addressed, in that it covers both Southwest Power Pool declared emergencies and those declared by Empire as the Local Balancing Authority.

Q. What is Staff's position on proposed changes?

A. Staff supports the changes in the Emergency Energy Conservation Plan with the exception of removing the content related to essential services/critical loads.

Q. What changes does Staff recommend be made to Empire's proposed Emergency Energy Conservation Plan P.S.C. Mo. No. 6, Sec. 5, 1st No. 22?

A. Staff recommends Empire's proposed Emergency Energy Conservation Plan tariff, P.S.C. Mo. No. 6, Sec. 5, 1st No. 22, be modified to include the following language:

If interruption of circuits that do not serve critical loads is insufficient to address the emergency, the Company will first interrupt circuits that are not critical for the operation of the system or that do not serve critical loads. Critical loads include but are not limited to: (1) Certain ambulatory health care, hospital services, (2) Defense communication

network centers; (3) Civil defense facilities; (4) Prisons; (5) Police, fire control, and first responder facilities that operate fulltime; (6) Potable water supply; (7) Natural gas transmission; (8) Sewage treatment; (9) Transportation hubs, such as airports and bus depots; (10) Registered heating/cooling centers.

Q. Do other utilities have similar tariff language?

A. Yes, for example Union Electric Company, d/b/a Ameren Missouri's tariff P.S.C. Mo. No. 6, Sec. 5, 1st Revised No. 146 contains similar tariff language.

Q. Why is Staff recommending these changes be included?

A. These critical loads provide essential services to the communities served by Empire and should have special provisions to ensure these customers are prioritized from interruptions of service to the extent possible.

Q. Do any other Staff witnesses discuss the Emergency Energy Conservation Plan?

A. Yes. Staff witness Sarah L.K. Lange discusses the Emergency Energy Conservation Plan as it relates to the creation of a new large customer class.

EMPIRE AUTHORIZED SERVICE TERRITORY IN CHRISTIAN COUNTY, MISSOURI

Q. Has Staff identified a change to be made to Empire's tariff regarding authorized service territory in Christian County, Missouri?

A. Yes. On page 17 of the current tariff, footnote number 1 indicates that Empire has a Territorial Agreement ("TA") with the City of Clever. This footnote should reference the second TA between Empire and Ozark Electric Cooperative ("Ozark").

Q. How should this be further reflected in the tariff?

A. Staff recommends that Empire reorganize the tariff sheets that reflect the territorial agreement and amendments with Ozark and remove the sheets specific to the City of Clever while maintaining any necessary changes from a recent territorial agreement

Direct Testimony of
Coty L. King

1 amendment in EO-2025-0253. Staff recommends Sheets 23, 23a, and 23b be removed once the
2 content is reorganized as these sheets would be duplicative.

3 Q. Does this conclude your direct testimony?

4 A. Yes, it does.

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)

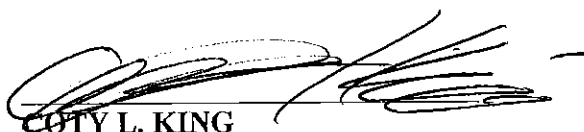
Case No. ER-2024-0261

AFFIDAVIT OF COTY L. KING

STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

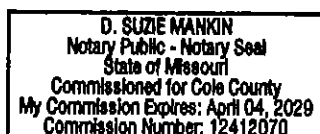
COMES NOW COTY L. KING and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Direct Testimony of Coty L. King*; and that the same is true and correct according to his best knowledge and belief.

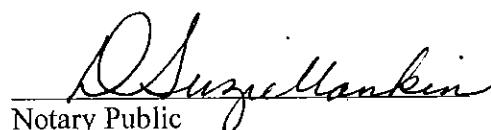
Further the Affiant sayeth not.


COTY L. KING

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 15th day of July 2025.




Notary Public

Coty L. King

Present Position:

I am a Senior Compliance Analyst in the Engineering Analysis Department, of the Industry Analysis Division of the Missouri Public Service Commission.

Educational Background and Work Experience:

I received my Bachelor of Business Administration from the University of Excelsior in 2023. I served in the United States Army as a Heavy Equipment Supervisory from 2008 through 2021. I have been employed by the Commission since 2023.

Case History:

Case Number	Utility	Type	Issue
GO-2023-0432	Spire	Gas	Infrastructure System Replacement Surcharge
E0-2024-0161	Evergy Missouri West	Electric	Change of Supplier
EO-2024-0281	Ameren	Electric	Vegetation Management Standards Variance
EO-2024-0297	Liberty (Empire)	Electric	RES Compliance Plan
EC-2024-0372	Ameren	Electric	Complaint
ER-2024-0189	Evergy	Electric	Rate Case
ER-2024-0319	Ameren	Electric	Rate Case
EC-2025-0136	Grain Belt	Electric	Complaint