Exhibit No. 178

Staff – Exhibit 178 Testimony of Christopher C. Walters True-Up Rebuttal File No. ER-2024-0261

Exhibit No.:

Issue(s): Rate of Return

Witness: Christopher C. Walters

Sponsoring Party: MoPSC Staff

Type of Exhibit: True-Up Rebuttal Testimony

Case No.: ER-2024-0261

Date Testimony Prepared: September 22, 2025

MISSOURI PUBLIC SERVICE COMMISSION FINANCIAL AND BUSINESS ANALYSIS DIVISION FINANCIAL ANALYSIS DEPARTMENT

TRUE-UP REBUTTAL TESTIMONY

OF

CHRISTOPHER C. WALTERS

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

CASE NO. ER-2024-0261

Jefferson City, Missouri September 2025

1	TRUE-UP REBUTTAL TESTIMONY					
2	OF					
3	CHRISTOPHER C. WALTERS					
4	THE EMPIRE DISTRICT ELECTRIC COMPANY,					
5	d/b/a Liberty					
6	CASE NO. ER-2024-0261					
7	I. INTRODUCTION					
8	Q. Please state your name and business address.					
9	A. My name is Christopher C. Walters. My business address is 16690 Swingley					
10	Ridge Road, Suite 140, Chesterfield, Missouri 63017.					
11	Q. Are you the same Christopher C. Walters who previously filed					
12	Direct Testimony, Rebuttal Testimony, and Surrebuttal Testimony on behalf of the Staff of the					
13	Missouri Public Service Commission ("Commission") on July 2, 2025, August 18, 2025,					
14	and September 17, 2025?					
15	A. Yes, I am.					
16	Q. What is the purpose of your True-Up Rebuttal Testimony?					
17	A. The purpose of my True-Up Rebuttal Testimony is to provide Staff's overall rate					
18	of return ("ROR") recommendation including an appropriate capital structure, return on					
19	equity ("ROE"), and cost of debt.					

II. STAFF'S FINAL RECOMMENDED RATE OF RETURN

- Q. What is Staff's recommended overall ROR?
- A. Staff's final recommended overall ROR is 7.16%, based on the updated true-up information. This ROR is based on Empire District Electric Company's ("Empire") capital structure and cost of debt as provided in its True-Up Direct Testimony, as well as my recommended ROE of 9.50%. Staff's recommended ROR is summarized below in Table CCW-1TR.

TABLE CCW-1TR

Staff's Recommended Rate of Return

Description	Weight ¹	Cost ^{2,1}	Weighted Cost
Common Equity	53.00%	9.50%	5.04%
Long-Term Debt	47.00%	4.53%	2.13%
Total	100.00%		7.16%

Sources:

- Q. Does this conclude your True-Up Rebuttal Testimony?
- A. Yes, it does.

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¹The proposed capital structure and cost of debt are provided in the Surrebuttal & True-up Direct testimony of Daniel Dane at 30

²Surrebuttal testimony of Christopher Walters at 15.

¹Page 30, Daniel Dane's Surrebuttal / True-up Testimony.

²Page 15, Chris Walters' Surrebuttal Testimony.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Reque District Electric Company Authority to File Tariffs In Electric Service Provided t Missouri Service Area	d/b/a I icreasii)))	Case No. ER-2024-0261	
AFFI	DAVI	T OF CHRIS	торн	ER C. WALTERS
STATE OF MISSOURI)	SS.		
COUNTY OF ST. LOUIS)	55.		

COMES NOW CHRISTOPHER C. WALTERS and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *True-Up Rebuttal Testimony of Christopher C. Walters*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

CHRISTOPHER C. WALTERS

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for St. Louis County, State of Missouri, at my office in Chesterfield, on this 22nd day of September, 2025.

ADRIENNE J. FOLLETT
Notary Public - Notary Seal
STATE OF MISSOURI
Jefferson County
My Commission Expires: Mar. 22, 2029
Commission # 21989987

Notary Public