

In the Matter of a Working Case for)
Commission Review and Consideration of) Case No. OW-2025-0085
Utility Assistance Programs and Special)
Alternative Customer Rates)

COMES NOW The Empire District Electric Company d/b/a Liberty (“EDE”), The Empire District Gas Company d/b/a Liberty (“EDG”), Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty (“Midstates”), and Liberty Utilities (Missouri Water) LLC d/b/a Liberty (collectively “Liberty”), by and through counsel, and for its Response to the *Order Opening Working Case and Directing Responses*, Liberty respectfully states as follows to the Missouri Public Service Commission (“Commission”):

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can unintentionally harm the very customers they aim to protect. Prolonged suspension of normal collection practices often results in large, unmanageable balances, making recovery even harder for the most vulnerable customers and ultimately undermining affordability. To safeguard customers and maintain fairness, it is critical to transition back to standard operating procedures – including timely disconnections for nonpayment and structured payments plans, while continuing to offer supportive programs that help customers manage and reduce arrearages responsibly.

5. A Liberty affiliate in Massachusetts offers a program called “Arrearage Management Program” or “AMP” that allows residential customers who make full payments on-time for a period to have their past due balances forgiven.¹

6. Liberty encourages the Commission to consider developing a universal enrollment application for all Missouri-regulated utility customer affordability and assistance programs. This approach could enhance accessibility and effectiveness of assistance programs for customers while also streamlining program administration which may help reduce overhead costs. In August of 2024, the Pennsylvania Public Utility Commission issued an Order in Docket M-2023-3038944 wherein the Pennsylvania PUC encouraged all jurisdictional energy and water/wastewater public utilities with assistance programs to modify application forms to be consistent with its Common Application Form recommendations.² Appendix A to the Order in Docket M-2023-3038944 shows the consensus example Common Application Form.

/s/ _____
Diana C. Carter MBE #50527

¹ More information on the AMP can be found at: <https://massachusetts.libertyutilities.com/fall-river/residential/my-account/my-bill/programs/arrearage-management-program.html>.

² The Pennsylvania Public Utility Commission’s Order can be found at: <https://www.puc.pa.gov/pcdocs/1845753.pdf>. The corresponding press release can be found at: <https://www.puc.pa.gov/press-release/2024/puc-supports-a-common-application-form-to-break-down-barriers-to-essential-public-utility-assistance-for-eligible-families-08232024>.

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CERTIFICATE OF SERVICE

I hereby certify that the above document was filed in EFIS on this 14 day of November, 2025, with notification of the same being sent to all counsel of record, and I further certify that the above document was sent by electronic transmission to all counsel of record.

/s/ Jermaine Grubbs