

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Application of The Empire)
District Electric Company for an Order Granting) Case No. EE-2026-0065
Temporary Billing Variances)

In the Matter of the Application of The Empire)
District Gas Company and Liberty Utilities) Case No. GE-2026-0066
(Midstates Natural Gas) Corp. for an Order)
Granting Temporary Billing Variances)

In the Matter of the Application of Liberty)
Utilities (Missouri Water) LLC for an Order) Case No. WE-2026-0067
Granting Temporary Billing Variances)

**RESPONSE TO COMMISSION ORDER AND
UNOPPOSED MOTION FOR EXTENSION OF TEMPORARY VARIANCES**

COME NOW The Empire District Electric Company (“EDE”), The Empire District Gas Company (“EDG”), Liberty Utilities (Missouri Water) LLC (“Missouri Water”), and Liberty Utilities (Midstates Natural Gas) Corp. (“Midstates”) (collectively, “Liberty” or the “Companies”), pursuant to 20 CSR 4240-2.205, and submit this Response to Commission Order and Unopposed Motion for Extension of Temporary Variances with regard to the Companies’ processes for handling collective/joint customer billing.

1. Collective billing is a customer-focused Liberty offering designed for individuals or entities with multiple accounts at different locations who prefer a consolidated summary bill. Liberty provides electric, natural gas, water and wastewater services in Missouri – often in various combinations to the same customer, and joint billing is a customer-focused Liberty offering that allows these customers to receive their multiple bills at the same time. Liberty faced billing challenges for collective and joint account customers primarily due to timing variations in meter reads across multiple accounts and/or commodities, leading to delays and inconsistencies in consolidated billing.

2. On September 11, 2025, Liberty filed an Application for Temporary Variances, Request for Waiver, and Motion for Expedited Treatment, explaining that Liberty was changing the handling of collective/joint customer billing in light of issues with billing delays and inconsistencies in consolidated billing due to timing variations in meter reads across multiple accounts and/or commodities. To that end, the Companies asked for six-month temporary variances from (1) Commission Rule 20 CSR 4240-13.020(1) which, in conjunction with Rule 13.015(1)(C), provides that a billing period shall include usage of not less than 26 days nor more than 35 days; and (2) Commission Rule 20 CSR 4240-13.020(6) which provides that, when a meter reading route or billing cycle is changed by 9 days or more, notice shall be provided to customers at least 15 days prior to the date a customer will receive a bill based on the new cycle.

3. On September 19, 2025, the Commission issued its *Order Granting Application for Temporary Variances, Request for Waiver, and Motion for Expedited Treatment*, effective October 1, 2025 (the “*Variance Order*”), granting Liberty six-month variances (to March 19, 2026) from Commission Rules 20 CSR 4240-13.020(1) and 20 CSR 4240-13.020(6). (The Company shall complete the realignment of joint and collective accounts as addressed in Case No. EE-2026-0065 by March 31, 2026, to be demonstrated in data for April 2026 billing, with the Company to file a Report in this docket demonstrating compliance no later than May 15, 2026.

4. With the *Variance Order*, the Commission directed Liberty to keep Staff apprised of the progress of the process changes for collective and joint accounts and to file a report in each variance case when the process is complete. Liberty has worked diligently on the conversion process of aligning meter reads and billing dates for collective and joint accounts, keeping Staff apprised of the progress. Active bill shifting began on October 8, 2025, and Liberty utilized a phased approach, to support a smooth transition and an improved experience for customers.

5. The process is now complete for EDE, EDG, and Missouri Water (water). For collective accounts, the conversion process is complete for 14,484 electric accounts, 174 water accounts, and 545 gas accounts (EDG and Midstates Natural Gas). For joint accounts, the process is complete for 20,755 electric accounts, 278 gas accounts, 7,880 water accounts, and 4,109 wastewater accounts.

6. As Liberty was performing the initial conversion process, it became apparent that a permanent variance is needed from Commission Rule 13.020(1) to support the continued offering of the joint/collective billing options. A separate filing will be made in this regard.

7. For Missouri Water (sewer), approximately 150 wastewater customers in Jackson, Missouri, remain in the queue to have their sewer bills aligned with their gas bills. For Midstates, approximately 100 accounts need to be realigned. To complete the realignment and the process change for the remaining collective/joint accounts, one-time adjustments will be necessary that could place certain accounts temporarily outside of the standard billing window (26-35 days) and that could shift meter reading routes or billing cycles by 9 days or more without notice being provided to customers at least 15 days prior to the date a customer will receive a bill based on the new cycle.

8. As such, Missouri Water and Midstates request an extension/continuation of the previously granted temporary variances from Commission Rules 13.020(1) and 13.020(6) to allow for Missouri Water and Midstates to complete the initial conversion processes for these remaining accounts. Missouri Water and Midstates request an additional 90-days to complete these processes.

9. Liberty's communication plan regarding the collective/joint account process changes considers three key stakeholders: employees, customers, and communities. For employees, key messages were provided to customer service representatives ("CSRs") to assist the

CSRs with answering questions from customers. For impacted customers, Liberty mailed a letter prior to the change and included a bill insert with impacted customer bills. Liberty also placed an alert on the Company's website directing customers to information about the process change and included an announcement on the process change in Liberty's monthly customer email newsletter. For the communities served by Liberty, the Company targeted outreach to update community leaders and government officials regarding the process change and customer communications.

10. The Companies implemented process changes for the handling of collective/joint customer billing so they could meet customers' requests and regulatory requirements governing billing. Good cause continues to exist for these variance requests because many customers with multiple accounts prefer to have all of their accounts consolidated onto one bill, and the Company seeks to provide billing in a form that meets that preference.

11. Liberty discussed this request with the Staff of the Commission and the Office of the Public Counsel and neither oppose the grant of this Motion.

WHEREFORE, Liberty respectfully requests, for good cause shown, that the Commission grant its Motion for Extension of Temporary Variances regarding Commission Rules 20 CSR 4240-13.020(1) and 20 CSR 4240-13.020(6) for Liberty's collective/joint billing processes.

Respectfully submitted,

/s/ Diana C. Carter

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CERTIFICATE OF SERVICE

I hereby certify that the above document was filed in EFIS on this 10th day of April, 2026, and sent by electronic transmission to the Staff of the Commission and the Office of the Public Counsel.

/s/ Diana C. Carter