

**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) Case No. ER-2024-0261
For Electric Service Provided to Customers)
In its Missouri Service Area)

RESPONSE TO COMMISSION ORDER

COMES NOW The Empire District Electric Company d/b/a Liberty (“Liberty” or the “Company”) and submits this Response to Commission Order regarding the realignment of joint and collective electric accounts. In this regard, Liberty respectfully states as follows to the Missouri Public Service Commission (the “Commission”):

1. Ordered paragraph five of the *Report and Order* issued by the Commission on January 14, 2026, approves the terms of the Supplemental Stipulation filed on December 12, 2025, and directs the signatories to comply with its terms. Paragraph seven of the Supplemental Stipulation provides as follows:

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.

2. Within the variance period, the collective account conversion process was completed for approximately 14,500 electric accounts. For joint accounts, the process was completed for approximately 20,500 electric accounts. Joint account realignment work remains to be done for approximately 550 electric accounts. Without a variance currently in place, at this time, the work will be done only in conformity with the Commission’s Chapter 13 Rules.

3. As Liberty was performing the initial conversion process, it became apparent that permanent variances are needed from (a) 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 (b) 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, to support the continued offering of the joint/collective billing options to Liberty's Missouri customers.

4. An example of a situation that will likely repeat itself is when a customer requests to add an account to an existing collective or joint summary bill or when a customer requests to create a new collective or joint summary bill. The subsequent bill after the month of alignment in either such situation may have a long or short billing period and/or may result in a meter reading route or billing cycle change of 9 days or more. There are also various scenarios that come into play with landlord "parent" accounts.

5. The need for permanent variances has been discussed with Staff and the Office of the Public Counsel, and an application in this regard will be filed in Case No. EE-2026-0065.

WHEREFORE, Liberty respectfully submits this Response to Commission Order and requests such relief as is just and proper under the circumstances.

ATTORNEYS FOR THE EMPIRE DISTRICT ELECTRIC COMPANY
d/b/a LIBERTY

/s/

Diana C. Carter MBE #50527
602 S. Joplin Ave.
Joplin, MO 64801
Cell Phone: (573) 289-1961
E-Mail: Diana.Carter@LibertyUtilities.com

Dean L. Cooper MBE #36592
BRYDON, SWEARENGEN & ENGLAND, P.C.
312 East Capital Avenue; P.O. Box 456
Jefferson City, Missouri 65702
Phone: (573) 635-7166
E-Mail: dcooper@brydonlaw.com

CERTIFICATE OF SERVICE

I hereby certify that the above document was filed in EFIS on this 15th day of May, 2026, 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/ Diana C. Carter