

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

In the Matter of the Application of Ryan	)	
Edwards for Change of Electric Supplier to	)	
Ozark Electric Cooperative, Inc., from The	)	Case No. EO-2026-0306
Empire District Electric Company d/b/a Liberty	)	

LIBERTY’S RESPONSE TO APPLICATION

COMES NOW The Empire District Electric Company d/b/a Liberty (“Liberty” or the “Company”), and for its response to the Application of Ryan Edwards (the “Applicant”) and the *Order Directing Notice, Adding Parties, and Directing Responses to Application* issued herein by the Missouri Public Service Commission (the “Commission”), Liberty respectfully states as follows:

1. Liberty admits the factual allegations of paragraphs one and three of the application. Regarding paragraphs two and four of the application, Liberty admits that it is the current electric supplier for the property and that the Applicant is requesting that the electric supplier for the Applicant’s property be changed from Liberty to Ozark Electric Cooperative, Inc. (the “Cooperative”).

2. Liberty generally denies the allegations of paragraphs five and six of the application, and Liberty denies all allegations not specifically admitted herein.

3. RSMo. §393.106 and §394.315, commonly referred to as Missouri’s anti-flip flop laws, typically govern change of supplier requests. RSMo. §394.315 refers to rural electric cooperatives (like the Cooperative), while §393.106 refers to electric corporations (like Liberty) and joint municipal utility commissions. The purpose of the statutes is to “prevent customers from switching back and forth between two available electric suppliers to take advantage of rate

differences” – a strong public policy of our state. *Empire Dist. Elec. Co. v. Southwest Elec. Co-op.*, 863 S.W.2d 892, 896 (Mo. App. S.D. 1993).

4. The statute further provides that the Commission, upon application, may order a change of supplier “on the basis that it is in the public interest for a reason other than a rate differential.”

5. The Applicant does not state, in the application filed herein, that the change of supplier request from Liberty to the Cooperative is based on a perceived rate differential. Liberty, however, is unaware of any facts that would justify a change of supplier in this case. Liberty reviewed the Applicant’s customer account, including all recorded calls, and Liberty believes the Applicant has received safe and reliable electric service from Liberty and that granting a change of supplier in this case would be contrary to the public interest.

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

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 26th day of May, 2026, with notification of the same being sent to all counsel of record.

/s/ Diana C. Carter