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 Temporary Billing Variances	)))	Case No. EE-2026-0065
In the Matter of the Application of The Empire District Gas Company and Liberty Utilities (Midstates Natural Gas) Corp. for an Order Granting Temporary Billing Variances	))))	Case No. GE-2026-0066
In the Matter of the Application of Liberty Utilities (Missouri Water) LLC for an Order Granting Temporary Billing Variances	)))	Case No. WE-2026-0067

APPLICATION FOR PERMANENT 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 4240-13.065, and submit this Application for Permanent Variances with regard to the Companies' billing practices, including the processes for handling collective/joint customer billing.

1. Commission Rule 20 CSR 4240-13.065(1) provides that any "utility may file an application with the commission seeking a variance from all or parts of Chapter 13, which may be granted for good cause shown." With this Application for Permanent Variances, the Companies seek variances from portions of Chapter 13 regarding (a) collective/joint accounts and (b) the crediting of interest to customer accounts.

2. Commission Rule 20 CSR 4240-13.065(2) requires that a utility filing an application for a variance from all or parts of Chapter 13 "shall mail, contemporaneously with the filing, copies of the application by first class mail to the newspaper with the largest circulation in

each county within the utility's service area affected by the variance, the public counsel and each party in the utility's most recent rate case who represented residential customers." The Companies complied with this provision when they first originated the above-referenced dockets. The Companies are also complying with this provision with regard to this Application for Permanent Variances.

3. Commission Rule 20 CSR 4240-13.065(3) provides that any variance granted by the Commission from all or parts of Chapter 13 shall be reflected in a tariff. Proposed tariff sheets are attached hereto for each variance requested by this Application for Permanent Variances.

A. Collective and Joint Accounts

4. 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 commodity bills at the same time.

5. 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 except for initial, corrected, or final bills; 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.

6. 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, granting Liberty six-month variances from Commission Rules 20 CSR 4240-13.020(1) and 20 CSR 4240-13.020(6). On April 23, 2026, the Commission issued an *Order Granting Unopposed Motion for Extension of Temporary Variances*, allowing the Companies an additional 90 days to complete the initial conversion process for certain accounts.

7. 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. To address these billing issues and create a better customer experience, Liberty sought the initial temporary variances from Commission Rules 13.020(1) and 13.020(6) to allow the Companies to change the processes for collective and joint billing by aligning all so-called "child" accounts to the so-called "parent" account's meter read schedule (or placing all commodities on the same meter read cycle).

8. As Liberty was completing the initial conversion process, it became apparent that permanent variances are needed from Commission Rules 13.015(1)(C) and 13.020(1) to support the continued offering of the joint/collective billing options. Even after completion of the initial conversion/realignment process, the permanent variance will be needed for the following collective/joint account scenarios:

a. when a customer requests to add an account to (or remove an account from) an existing collective or joint summary bill, the subsequent bill after the month of alignment 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;

b. if a customer requests to create a new collective or joint summary bill, the subsequent bill after the month of alignment 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;

c. if a long or short bill, issued pursuant to a variance, must be corrected and reversed, the new bill will also have a long or short billing period and will not always be a first or final bill and/or fall within the definition of a corrected bill;

d. when a landlord requests service be put in (or taken out of) their name on a child account, it will need to be aligned, which may lead to a short or long bill and/or may result in a meter reading route or billing cycle change of 9 days or more;[1]

e. when a landlord sets up a new owner allocation/default on new properties, but the locations are currently in the names of tenants, these will need to be aligned to the landlord parent account and may create a long or short billing period in the month after alignment and/or may result in a meter reading route or billing cycle change of 9 days or more; and

f. Liberty offers a landlord revert or default option that automatically puts service in the landlord's name when a tenant moves out. If service was not in the landlord's name at the time of conversion/alignment activities, that account may not be aligned. Liberty will monitor and align these accounts once the default transfers back into the landlord's name. Each subsequent bill 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. Additionally, where a customer in the system is a landlord and is in the process of being moved into a location and aligned to their collective account and before the alignment is competed, a tenant calls to move in, the system continues the path of aligning the landlord's closed account to the landlord's collective account date. In this instance, the tenant may receive two short/long bills.

9. As such, and to allow for the continued offering of joint/collective billing options to Liberty's customers, the Companies seek permanent variances from: (a) Commission Rule 20 CSR 4240-13.020(1) and Commission Rule 20 CSR 4240-13.015(1)(C) regarding a billing period including usage of not less than 26 days nor more than 35 days except for initial, corrected, and final bills; 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. Liberty

[1] For scenarios d-f, Liberty seeks a variance from Rules 13.015(1)(C) and 13.020(1) in the event scenarios occur for something other than an initial or final bill.

requests that the grant of these permanent variances be effective as of the dates the temporary variances expired/expire.

10. Pursuant to Commission Rule 20 CSR 4240-13.065(3) and regarding the requested variances for collective and joint accounts, proposed tariff sheets, in redlined format, are attached hereto as Exhibits A (EDE), B (EDG), C (Missouri Water – water), D (Missouri Water – sewer), and E (Midstates).

11. Liberty's communication plan regarding this change in process 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 initial changes and included a bill onsert 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.

12. In addition to prior communications, Liberty will provide enhanced talking points to CSRs, along with a job aid outlining the scenarios addressed under the permanent variances and detailed guidance for responding to customer inquiries. These materials will be reviewed with all CSRs within fifteen (15) business days following approval of the permanent variances and will thereafter be incorporated into the standard new hire training curriculum.

13. The Companies implemented process changes for the handling of collective/joint customer billing so they could meet customers' requests and preferences and regulatory requirements governing billing. Good cause exists for these 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.

B. Interest on Customer Deposits

14. Commission Rule 20 CSR 4240-13.030(4)(B) provides, in part, that interest on customer deposits "shall be credited annually to the account of the customer or paid upon the return of the deposit to the customer, whichever occurs first." Liberty seeks permanent variances from this portion of the rule to allow the interest on customer deposits to be credited to the account of the customer on a billing period basis (instead of annually).

15. EDE, EDG, Missouri Water, and Midstates are subsidiaries of Liberty Utilities Co., which also owns various other utilities in other jurisdictions. The requested variances will allow Liberty Utilities Co. to credit interest to Missouri customer accounts in the same manner that is applied elsewhere, allowing for consistency across jurisdictions. An individual configuration within Liberty's system would be required in order for the Missouri utilities to credit interest to customer accounts on only an annual basis. The variance will not result in any harm to customers and there is good cause for the granting of the same, as Liberty seeks to credit interest to customer accounts more frequently than is required by Commission rule.

16. Pursuant to Commission Rule 20 CSR 4240-13.065(3) and regarding the requested variances related to the crediting of interest to customer accounts, proposed tariff sheets, in redlined format, are attached hereto as Exhibits F (EDE), G (EDG), H (Missouri Water – water), I (Missouri Water – sewer), and J (Midstates).

WHEREFORE, Liberty respectfully requests, for good cause shown, that the Commission grant this Application for Permanent Variances regarding (a) Commission Rules 20 CSR 4240-13.015(1)(C), 20 CSR 4240-13.020(1), and 20 CSR 4240-13.020(6) and Liberty's collective/joint billing processes and (b) a portion of Commission Rule 20 CSR 4240-13.030(4)(B) and the crediting of interest to customer accounts. Liberty requests such further relief as is just and proper under the circumstances.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that the above document was filed in EFIS on this 24th day of June, 2026, and sent by electronic transmission to the Staff of the Commission and the Office of the Public Counsel.

/s/ Diana C. Carter