

**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	)	<u>Case No. EE-2026-0065</u>
Granting Temporary Billing Variances	)	

In the Matter of the Application of the Empire	)	
District Gas Company d/b/a Liberty and Liberty	)	<u>Case No. GE-2026-0066</u>
Utilities (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	)	<u>Case No. WE-2026-0067</u>
Granting Temporary Billing Variances	)	

REQUEST FOR COMMISSION ORDER DIRECTING FILING

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through the undersigned counsel, and for its *Request for Commission Order Directing Filing* respectfully states as follows:

1. On June 24, 2026, 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) filed an *Application for Permanent Variances* (Application) with regard to Liberty’s billing practices, including the process for handling collective/joint customer billing and interest on customer deposits.

2. The Application requests permanent variances for collective and joint accounts 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.

3. Liberty also requests a permanent variance regarding interest on customer deposits from Commission Rule 20 CSR 4240-13.030(4)(B), specifically, the portion of the rule allowing the interest on customer deposits to be credited to the account of the customer on a billing period basis (instead of annually).

4. After reviewing the Application, Staff has a number of concerns to discuss with Liberty. In order to provide Staff and Liberty time to discuss and address these concerns, Staff requests the Commission issue an order directing Staff to file a recommendation regarding this matter no later than August 31, 2026.

5. Staff has discussed this request with Liberty, and Liberty informed Staff that it has no objection to Staff's request.

WHEREFORE Staff respectfully requests that the Commission issue an order directing Staff to file its recommendation in this matter no later than August 31, 2026, and to grant such other and further relief as the Commission considers just and reasonable under the circumstances.

Respectfully submitted,

/s/ Travis J. Pringle

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**ATTORNEY FOR THE STAFF OF THE
MISSOURI PUBLIC SERVICE
COMMISSION**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all parties and/or counsel of record this 22nd day of July 2026.

/s/ Travis J. Pringle