

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

In the matter of The Empire District)
Electric Company for Authority to File)
Tariffs Increasing Rates for Electric)
Service Provided to Customers in the)
Company’s Missouri Service Area)

File No. ER-2014-0351

**JOINT FILING IN RESPONSE TO ORDER DIRECTING FILING OF ESTIMATES OF
RESIDENTIAL CUSTOMER CLASS REVENUE NEUTRAL INTERCLASS SHIFT**

COME NOW the Staff of the Missouri Public Service Commission and The Empire District Electric Company (“Empire”), by and through counsel, and provide to the Commission certain table attachments showing an analyses of rate design impacts on Empire’s customer classes by comparing the settled rate design agreed upon by six of the seven parties to this case and the rate design proposed in Midwest Energy Consumer Group’s (“MECG”) surrebuttal testimony. In support thereof, the Staff and Empire have attached to this pleading the following:

- Attachment A: page 1; Rate Design Comparison by class of the settled position (from the Non-Unanimous Stipulation and Agreement) and MECG’s proposed revenue shifts, with detailed comparison of the Residential and Large Power rate classes; and, page 2, detailed comparison of the Commercial Building and General Power rate classes.
- Attachment B: Residential Bill Comparison of current rates (by usage amounts) to the new rates from the settled position (Non-Unanimous Stipulation and Agreement) and new Residential rates as proposed by MECG.
- Attachment C: Individual Large Power Customer Bill Impact Analysis comparing the percent increase to each customer as a result of the settled position (Non-Unanimous Stipulation and Agreement) to MECG’s proposed rate increase (or decrease) both with and without MECG’s Tail Block position. Note: Attachment C shows rate design impact for each Large Power customer in the rate class, without revealing customer number or name.

WHEREFORE, the Staff and Empire pray the Commission accept this joint pleading as its response to the Commission's June 11, 2015 order.

Respectfully submitted,

THE EMPIRE DISTRICT ELECTRIC
COMPANY

/s/ Diana C. Carter

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 15th day of June, 2015.

/s/ Robert S. Berlin

Empire Rate Classes	% Increase*		Difference
	Settlement Result Non-Unanimous Stip & Agreement	MECG Revenue Shifts	
Residential Service	4.63%	6.54%	1.91%
Commercial Service	3.86%	2.34%	-1.52%
Small Heating Service	3.86%	3.74%	-0.11%
Total Electric Building Service	2.97%	2.31%	-0.67%
General Power Service	2.97%	0.85%	-2.12%
Large Power Service	2.97%	0.99%	-1.99%
Special Contract - PRAXAIR	3.86%	2.90%	-0.96%
Feed Mill & Grain Elevator Service	0.00%	0.00%	0.00%
Miscellaneous Service	0.00%	0.00%	0.00%
Municipal Street Lighting Service	0.00%	0.00%	0.00%
Private Lighting Service	0.00%	0.00%	0.00%
Special Lighting Service	0.00%	0.00%	0.00%
Total	3.79%	3.79%	0.00%

*Percent Increase do not include Pre-MEEIA.

Detailed Rate Comparison

Class/Rate	Current Rate	Settlement Result	% Change From Current with Settlement Result	MECG Shift without MECG Tail Block Position	% Change From Current with MECG Shift	MECG Shift With Tail Block Position	% Change From Current with MECG Shift and TB
Residential							
Customer Charge	\$ 12.52	\$ 12.52	0.00%	\$ 12.52	0.00%	\$ 12.52	0.00%
Summer First Block Energy	\$ 0.11490	\$ 0.12078	5.12%	\$ 0.12321	7.23%	\$ 0.12321	7.23%
Summer Second Block Energy	\$ 0.11490	\$ 0.12078	5.12%	\$ 0.12321	7.23%	\$ 0.12321	7.23%
Winter First Block Energy	\$ 0.11490	\$ 0.12078	5.12%	\$ 0.12321	7.23%	\$ 0.12321	7.23%
Winter Second Block Energy	\$ 0.09340	\$ 0.09818	5.12%	\$ 0.10016	7.24%	\$ 0.10016	7.24%
Large Power							
Customer Charge	\$ 247.73	\$ 255.26	3.04%	\$ 250.23	1.01%	\$ 250.55	1.14%
Summer First Energy Block	\$ 0.06710	\$ 0.06914	3.04%	\$ 0.06778	1.01%	\$ 0.06786	1.14%
Summer Second Energy Block	\$ 0.03630	\$ 0.03739	3.00%	\$ 0.03667	1.01%	\$ 0.03130	-13.77%
Winter First Energy Block	\$ 0.05960	\$ 0.06141	3.04%	\$ 0.06020	1.01%	\$ 0.06028	1.14%
Winter Second Energy Block	\$ 0.03500	\$ 0.03605	3.00%	\$ 0.03535	1.01%	\$ 0.03000	-14.29%
Summer Billing Demand	\$ 13.70	\$ 14.12	3.07%	\$ 13.84	1.01%	\$ 14.86	8.44%
Winter Billing Demand	\$ 7.57	\$ 7.80	3.04%	\$ 7.65	1.01%	\$ 8.21	8.44%
Facilities Demand	\$ 1.649	\$ 1.700	3.09%	\$ 1.666	1.01%	\$ 1.668	1.14%

Detailed Rate Comparison Cont.

<u>Class/Rate</u>	<u>Current Rate</u>	<u>Settlement Result</u>	<u>% Change From Current with Settlement Result</u>	<u>MECG Shift without MECG Tail Block Position</u>	<u>% Change From Current with MECG Shift</u>	<u>MECG Shift With Tail Block Position</u>	<u>% Change From Current with MECG Shift and TB</u>
Commercial Building							
Customer Charge	\$ 21.32	\$ 22.14	3.85%	\$ 21.82	2.35%	\$ 21.82	2.35%
Summer First Energy Block	\$ 0.12370	\$ 0.12847	3.86%	\$ 0.12659	2.34%	\$ 0.12659	2.34%
Summer Second Energy Block	\$ 0.12370	\$ 0.12847	3.86%	\$ 0.12659	2.34%	\$ 0.12659	2.34%
Winter First Energy Block	\$ 0.12370	\$ 0.12847	3.86%	\$ 0.12659	2.34%	\$ 0.12659	2.34%
Winter Second Energy Block	\$ 0.11120	\$ 0.11549	3.86%	\$ 0.11379	2.33%	\$ 0.11379	2.33%
General Power							
Customer Charge	\$ 67.00	\$ 69.01	3.00%	\$ 67.57	0.85%	\$ 67.57	0.85%
Summer First Energy Block	\$ 0.08700	\$ 0.08960	2.99%	\$ 0.08774	0.85%	\$ 0.08774	0.85%
Summer Second Energy Block	\$ 0.06830	\$ 0.07034	2.99%	\$ 0.06888	0.85%	\$ 0.06888	0.85%
Summer Tail Energy Block	\$ 0.06170	\$ 0.06355	3.00%	\$ 0.06222	0.84%	\$ 0.06222	0.84%
Winter First Energy Block	\$ 0.07520	\$ 0.07745	2.99%	\$ 0.07584	0.85%	\$ 0.07584	0.85%
Winter Second Energy Block	\$ 0.06190	\$ 0.06375	2.99%	\$ 0.06243	0.86%	\$ 0.06243	0.86%
Winter Tail Energy Block	\$ 0.06140	\$ 0.06324	3.00%	\$ 0.06192	0.85%	\$ 0.06192	0.85%
Summer Billing Demand	\$ 7.07	\$ 7.28	2.97%	\$ 7.13	0.85%	\$ 7.13	0.85%
Winter Billing Demand	\$ 5.51	\$ 5.67	2.90%	\$ 5.56	0.91%	\$ 5.56	0.91%
Facilities Demand	\$ 1.998	\$ 2.060	3.10%	\$ 2.010	0.60%	\$ 2.010	0.60%

Missouri Public Service Commission
 Residential Bill Comparison
 Case No. ER-2014-0351

Attachement: B

	A	B		C		
	Current	Settlement Result Non-Unanimous Stip & Agreement		MECG	B/A %	C/A %
Average Monthly Bill						
500	\$ 69.97	\$ 72.91	\$ 74.13		4.20%	5.94%
1000	\$ 121.69	\$ 127.27	\$ 129.58		4.59%	6.49%
1500	\$ 171.97	\$ 180.13	\$ 183.51		4.75%	6.71%
2000	\$ 222.25	\$ 232.99	\$ 237.43		4.83%	6.83%

Summer Bill						
500	\$ 69.97	\$ 72.91	\$ 74.13		4.20%	5.94%
1000	\$ 127.42	\$ 133.30	\$ 135.73		4.61%	6.52%
1500	\$ 184.87	\$ 193.69	\$ 197.34		4.77%	6.74%
2000	\$ 242.32	\$ 254.08	\$ 258.94		4.85%	6.86%

Winter bill						
500	\$ 69.97	\$ 72.91	\$ 74.13		4.20%	5.94%
1000	\$ 118.82	\$ 124.26	\$ 126.51		4.58%	6.47%
1500	\$ 165.52	\$ 173.35	\$ 176.59		4.73%	6.69%
2000	\$ 212.22	\$ 222.44	\$ 226.67		4.82%	6.81%

Rates

Customer Charge	\$ 12.52	\$ 12.52	\$ 12.52			
Summer (\$/kWh)						
First 600 kWh	\$ 0.11490	\$ 0.12078	\$ 0.12321			
Over 600 kWh	\$ 0.11490	\$ 0.12078	\$ 0.12321			
Winter (\$/kWh)						
First 600 kWh	\$ 0.11490	\$ 0.12078	\$ 0.12321			
Over 600 kWh	\$ 0.09340	\$ 0.09818	\$ 0.10016			

Missouri Public Service Commission
 Individual Large Power Customer Bill Impact Analysis
 Case No. ER-2014-0351

Attachment: C

Customer	Settlement Result % Increase	MECG Shift without MECG Tail Block Position	MECG Shift With Tail Block Position
1	3.04%	1.02%	0.47%
2	3.04%	1.02%	0.19%
3	3.04%	1.02%	1.53%
4	3.01%	1.01%	0.51%
5	3.01%	1.01%	1.52%
6	3.04%	1.02%	2.17%
7	3.04%	1.02%	0.49%
8	3.04%	1.02%	1.32%
9	3.04%	1.02%	0.56%
10	3.01%	1.01%	1.07%
11	3.04%	1.02%	0.91%
12	3.00%	1.01%	1.69%
13	3.04%	1.02%	0.78%
14	3.04%	1.02%	0.20%
15	3.04%	1.01%	1.25%
16	3.04%	1.02%	1.78%
17	3.04%	1.02%	2.41%
18	3.05%	1.02%	4.04%
19	3.04%	1.02%	0.20%
20	3.04%	1.02%	-0.34%
21	3.04%	1.02%	-0.41%
22	3.04%	1.02%	3.33%
23	3.04%	1.02%	3.56%
24	3.05%	1.02%	3.78%
25	3.01%	1.01%	0.52%
26	3.04%	1.02%	-0.33%
27	3.04%	1.02%	0.50%
28	3.04%	1.02%	1.30%
29	3.04%	1.02%	1.41%
30	3.04%	1.02%	2.06%
31	3.04%	1.02%	0.11%
32	3.04%	1.02%	-0.17%
33	3.04%	1.02%	0.83%
34	3.04%	1.03%	5.31%
35	3.01%	1.01%	0.59%
36	3.04%	1.02%	1.98%
37	3.04%	1.02%	0.55%
38	3.04%	1.02%	0.65%
39	3.04%	1.02%	2.05%