

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

Christopher Perkin,	)	
	)	
Complainant,	)	
	)	
v.	)	<u>Case No. EC-2026-0309</u>
	)	
The Empire District Electric Company d/b/a,	)	
Liberty,	)	
	)	
Liberty	)	

STAFF REPORT AND RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and for its Report and Recommendation states as follows:

Complaint

1. On May 5, 2026, Christopher Perkin (“Complainant”) filed a formal complaint against The Empire District Electric Company d/b/a Liberty (“Liberty” or “Company”) concerning the interconnection and operation of his solar photovoltaic and battery energy storage system.

2. Complainant alleges that Liberty acted beyond its filed tariff by imposing requirements concerning unrestricted access to equipment, restraint of dogs, relocation of the disconnect switch, and a 21-day lockout of the system. Complainant further alleges that Liberty improperly prevented operation of the system despite its configuration to prevent

backfeed and failed to identify tariff authority for certain requirements imposed during the interconnection and commissioning process.

3. Complainant asks the Commission, among other things, to require Liberty to permit operation upon completion of required inspection and permission to operate; prohibit non-tariff access, relocation, and lockout requirements; require reasonable notice and coordinated access; require compliance with Liberty's Net Metering Rider and applicable Commission rules; and investigate Liberty's net-metering and interconnection practices.

Procedural History

4. On May 6, 2026, the Commission issued its Order Giving Notice of Complaint and Directing Response, directing Liberty to answer or otherwise respond no later than June 5, 2026, and directing Staff to file a Report or alternative pleading no later than June 19, 2026.

5. On June 18, 2026, Staff filed a Status Report requesting additional time to complete its investigation and asking that August 21, 2026, be established as the deadline for its Report and Recommendation. The Commission granted Staff's request that same day.

Liberty's Answer

6. On June 4, 2026, Liberty filed its Answer to Complaint. Liberty denied wrongdoing and asserted that its actions were consistent with its Commission-approved tariff, applicable Commission rules, and interconnection requirements. Liberty alleged that Complainant's system had operated and back-fed electricity onto its distribution system

without final approval; that Company personnel were entitled to safe and unobstructed access to metering and disconnect equipment; and that the Company was authorized to prevent operation and lock out a generating system operated without final approval. Liberty requested that the Complaint be dismissed or denied.

Complainant's Reply

7. Complainant thereafter filed his Reply to Liberty's Answer, disputing Liberty's allegations of unauthorized operation, backfeed, and safety hazards. Complainant asserted that Liberty had not produced meter data or other evidence establishing the alleged unauthorized operation; that Liberty's own instructions contemplated limited operation and backfeed during testing and commissioning; and that Liberty had not identified tariff provisions authorizing the 21-day lockout or mandatory relocation of the disconnect switch outside a fenced area. Complainant requested that the matter proceed on its merits.

Staff Investigation and Recommendation

8. Staff thereafter conducted a full investigation of the allegations raised by the Complaint, Answer, and Reply. Staff's investigation, findings, conclusions, and recommendations are fully set forth in its Memorandum attached hereto, marked **Exhibit A**, and incorporated herein by reference as though fully set forth herein.

9. ** [REDACTED]

[REDACTED]

[REDACTED]

10. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] **.

WHEREFORE, Staff respectfully prays that the Commission accept this Report and Recommendation as compliant with its Orders.

Respectfully submitted,

/s/ Paul T. Graham

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 21st day of August, 2026.

/s/ Paul T. Graham

Case No. EC-2026-0309

INFORMATION CONTAINED IN

THE MEMORANDUM

HAVE BEEN

DEEMED CONFIDENTIAL

IN ITS ENTIRETY