

**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	)	

STAFF RECOMMENDATION

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

1. On June 24, 2026, The Empire District Electric Company, The Empire District Gas Company, Liberty Utilities (Missouri Water) LLC, and Liberty Utilities (Midstates Natural Gas) Corp. (collectively, Liberty) filed an *Application for Permanent Variances* (Application) regarding Liberty’s billing practices, including the process for handling collective/joint customer billing and interest on customer deposits. The Application included redlined tariffs showing the proposed changes, and no proposed effective date.

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 requested, and the Commission granted, its motion to file a recommendation regarding Liberty's request no later than August 31, 2026.

I. Variances Regarding Collective and Joint Accounts

5. Staff has reviewed Liberty's proposed permanent variance request to Commission Rules 20 CSR 4240-13.020(1), 20 CSR 4240-13.015(1)(C) and 20 CSR 4240-13.020(6), concerning Collective/Joint accounts, and has no objection to Liberty being granted permanent variances for the following reasons:

- a. Collective and Joint accounts are voluntary billing options that allow customers the convenience to receive a single bill for multiple locations and/or commodities, and
- b. Customers are currently receiving this bill offering. If the Commission denied the request, it would be an inconvenience to customers and would require extensive process changes for Liberty.

6. However, Staff recommends that Liberty (1) place a message on customers' billing statements to inform customers that the establishment modification, or realignment of collective and joint billing may result in an unannounced billing cycle change or a bill outside of the 26-35 day billing cycle, and (2) add definitions to its tariffs for collective and joint accounts.

7. Staff recommends to the Commission that approval of the requested permanent variance for collective and joint accounts be conditioned on the two Staff recommendations above.

II. Variance Regarding Interest on Customer Deposits

8. Staff has reviewed Liberty's proposed permanent variance request to Commission Rule CSR 4240-13.030(4)(B), concerning Interest on Customer Deposits, and has no objection to Liberty being granted a permanent variance for the following reasons:

- a. Customers will receive the accrued interest more frequently than the rule requires, and
- b. Liberty is currently paying interest monthly and requiring Liberty to change this process would involve changing the billing system at a cost to all rate payers.

9. Staff recommends the Commission issue an order directing Liberty to file clean copies of the tariffs filed on June 24, 2026, complete with an effective date.

WHEREFORE Staff respectfully submits its *Recommendation* for the Commission's consideration, and requests the Commission order the relief requested herein.

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 31st day of August 2026.

/s/ Travis J. Pringle

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 Empire District Electric Company d/b/a) Case No. EE-2026-0065
 Liberty for an Order Granting Temporary)
 Billing Variances)

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Empire District Gas Company and Liberty	)	Case No. GE-2026-0066
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Variances	)	

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Granting Temporary Billing Variances)

AFFIDAVIT OF SCOTT J. GLASGOW

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW SCOTT J. GLASGOW and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.


SCOTT J. GLASGOW

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in
and for the County of Cole, State of Missouri, at my office in Jefferson City, on this
27th day of August 2026.




Notary Public