

**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	)	Case No. EE-2026-0065
Temporary Billing Variances	)	

In the Matter of the Application of The Empire	)	
District Gas Company and Liberty Utilities	)	Case No. GE-2026-0066
(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	)	Case No. WE-2026-0067
Granting Temporary Billing Variances	)	

In the Matter of the Application of Liberty	)	
Utilities (Missouri Water) LLC for an Order	)	Case No. SE-2027-0045
Granting Permanent Billing Variances	)	

RESPONSE TO STAFF RECOMMENDATIONS

COME NOW The Empire District Electric Company, The Empire District Gas Company, Liberty Utilities (Midstates Natural Gas) Corp. and Liberty Utilities (Missouri Water) LLC (collectively, “Liberty”), and state as follows to the Missouri Public Service Commission (“Commission”):

1. On August 31, 2026, the Staff of the Commission (“Staff”) filed its *Staff Recommendation* in the above-captioned cases.

2. Staff recommends approval of the requested permanent variance for collective and joint accounts, conditioned on two Staff recommendations - 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.

3. Moreover, Staff states that it has no objection to Liberty being granted a permanent variance concerning Interest on Customer Deposits and concludes by recommending that the Commission issue an order directing Liberty to file clean copies of the tariffs filed on June 24, 2026 (EE-2026-0065, GE-2026-0066 and WE-2026-0067) and August 10, 2026 (SE-2027-0045).¹

4. Liberty has reviewed the proposed conditions found in the referenced Staff Recommendations and states that it has no objection to the proposed conditions.

WHEREFORE, Liberty requests the Commission issue an order approving Liberty's *Applications for Permanent Variances*, subject to the conditions identified by Staff, and for such other and further relief as deemed appropriate in the circumstances.

Respectfully submitted,

//s// Dean L. Cooper
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**ATTORNEY FOR THE EMPIRE DISTRICT
ELECTRIC COMPANY, THE EMPIRE
DISTRICT GAS COMPANY, LIBERTY
UTILITIES (MIDSTATES NATURAL GAS)
CORP. AND LIBERTY UTILITIES
(MISSOURI WATER) LLC**

CERTIFICATE OF SERVICE

I hereby certify that the above and foregoing document was filed in EFIS on this 3rd day of September 2026, with notice of the same being sent to all parties by electronic mail.

//s// Dean L. Cooper

¹ Liberty notes that the tariff sheets filed will be modified to address Staff recommendations.