BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of The Empire District	)	
Electric Company d/b/a Liberty Fuel	)	**File No. EO-2027-0104**
Adjustment Clause True-up	)	Tracking No. JE-2027-0046

STAFF RECOMMENDATION

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

1. On October 1, 2026, The Empire District Electric Company d/b/a Liberty ("Liberty" or "Company") filed one (1) proposed tariff sheet, 13th Revised Sheet No. 17q, Canceling 12th Revised Sheet No. 17q, bearing a proposed effective date of December 1, 2026, to revise the Current Period Fuel Adjustment Rates[1] ("FARs") of its Fuel Adjustment Clause ("FAC") used to determine the Fuel Adjustment Charge on customers' bills. Liberty also filed direct testimony of its witness Monica K. Gloodt on October 1, 2026, and submitted to Commission Staff ("Staff") work papers in support of the proposed tariff sheet. The Commission assigned the tariff sheet to Tariff Tracking No. JE-2027-0046.

2. On October 1, 2026, the Commission entered an *Order* directing Staff to file a recommendation no later than October 30, 2026, and for any other responses to be filed no later than November 6, 2026.

[1] The Current Period FARs for service at transmission, primary voltage and above and for service at secondary voltage are located on lines 15, 16 and 17, respectively, of proposed 13th Revised Sheet No. 17q.

3. On October 28, 2026, Liberty filed a substitute tariff sheet[2] to remove the ammonia adjustment that was included in the originally filed tariff, and the Company is proposing changes to the headers of Tariff Sheet Nos. 17i through 17p.

4. The Current Period FAR of $0.00567 per kWh (Line 14 of 13th Revised Sheet No. 17q) is equal to the FPA Amount of $13,142,491 divided by the forecasted Missouri net system input ("NSI") for RP36 of 2,319,606,770 kWh, found on Line 13 of 13th Revised Sheet No. 17q.

5. Based on a monthly usage of 1,000 kWh, the proposed change to the FAR will decrease the Fuel Adjustment Charge of a Liberty residential customer's bill from $9.49 to $6.09, a decrease in the customer's bill by approximately $3.40 per month.

6. The true-up amount of $(836,823) RP34 is included in the preliminary calculation of the Fuel and Purchased Power amount ("FPA") included in Liberty's Accumulation Period 36 ("AP36") adjustment filing, also filed on October 1, 2026, in File No. ER-2027-0103, which Liberty filed in compliance with its FAC.

7. Staff examined the direct testimony of Liberty witness Monica K. Gloodt, the supporting schedules and work papers Liberty provided with its true-up filing in this case, and the monthly information Liberty has submitted to the Commission. Staff also reviewed and agrees with Liberty's monthly interest calculations for RP34.

[2] Except as otherwise stated, all references herein to the tariff sheet in Tariff tracking No. JE-2027-0046 shall be to the substitute proposed tariff sheet that Liberty filed October 27, 2026.

8. Staff verified that Liberty is not delinquent on any assessment and has filed its 2025 annual report. Liberty is current on submission of its monthly reports, required by 20 CSR § 4240-20.090(5), and its surveillance monitoring reports, required by 20 CSR § 4240-20.090(6).

9. As set forth in Staff's Recommendation filed herewith and incorporated herein by reference, Staff recommends the Commission approve Liberty's RP34 true-up filing for the billing months December 1, 2025, through May 31, 2026, during which Liberty over-collected $(836,823) from its customers for inclusion in the calculation of the FPA amount in Liberty's AP36 adjustment filing in File No. ER-2027-0103.

WHEREFORE, Staff respectfully requests that the Commission accept its Recommendation on this matter; and grant such other and further relief as the Commission considers just and reasonable in the circumstances.

Respectfully submitted,

/s/ Ray Cunneen
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First-Class United States Postal Mail, postage prepaid, on this 30th day of October, 2026, to all counsel of record.

/s/ Ray Cunneen

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. EO-2027-0104
The Empire District Electric Company, d/b/a Liberty (Empire)

FROM: Stacy L. Henderson, Senior Utility Regulatory Auditor

DATE: /s/ Stacy L. Henderson October 30, 2026
Energy Resources Department / Date

SUBJECT: Staff's Analysis of and Recommendation Concerning The Empire District Electric Company d/b/a Liberty (Empire) Thirty-Fourth Fuel Adjustment Clause True-up Filing Under the Provisions in 20 CSR 4240-20.090(9).

DATE: October 30, 2026

On October 1, 2026, The Empire District Electric Company d/b/a Liberty (hereinafter "Liberty" or "Company") filed with the Missouri Public Service Commission ("Commission"), in the form of direct testimony and supporting schedules of Liberty witness Monica K. Gloodt, its thirty-fourth true-up filing under the provisions of Commission Rule 20 CSR 4240-20.090(9).

Accumulation Period 34 ("AP34") includes the time period March 1, 2025, through August 31, 2025, and is followed by Recovery Period 34 ("RP34"), which includes the billing months of December 1, 2025, through May 31, 2026. The true-up amount of $(836,823) identified in this filing is the result of an over-collection of the Fuel and Purchased Power Adjustment ("FPA") amount for AP34 during RP34.

The true-up amount of $(836,823) RP34 is included in the preliminary calculation of the Fuel and Purchased Power amount ("FPA") included in Liberty's Accumulation Period 36 ("AP36") adjustment filing, also filed on October 1, 2026, in File No. ER-2027-0103, which Liberty filed in compliance with its FAC.[1]

[1] The Empire District Electric Company's P.S.C. Mo. No. 6, Section 4, 1st Revised Sheet No. 17p tariff sheet (Item (T) and item (I) are defined in P.S.C. Mo. No. 6, Section 4, 1st Revised Sheet No. 17o):

The Commission Staff ("Staff") examined the direct testimony of Liberty witness Monica K. Gloodt, the supporting schedules and work papers Liberty provided with its true-up filing in this case, and the monthly information Liberty has submitted to the Commission. Staff also reviewed and agrees with Liberty's monthly interest calculations for RP34.

Based on its examination and analysis of information Liberty filed and submitted in this case, Staff recommends the Commission approve Liberty's RP34 true-up filing for the billing months December 1, 2025, through May 31, 2026, during which Liberty over-collected $(836,823) from its customers for inclusion in the calculation of the FPA amount in Liberty's AP36 adjustment filing in File No. ER-2027-0104.

TRUE-UP OF FPA: In conjunction with an adjustment to its FAR, the Company will make a true-up filing with an adjustment to its FAC on the first Filing Date that occurs after completion of each Recovery Period. The true-up adjustment shall be the difference between the FPA revenues billed and the FPA revenues authorized for collection during the true-up recovery period, i.e. the true-up adjustment. Any true-up adjustments or refunds shall be reflected in item (T) above and shall include interest calculated as provided for in item (I) above.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of The Empire District Electric Company d/b/a Liberty Fuel Adjustment Clause True-Up	)))	File No. EO-2027-0104

AFFIDAVIT OF STACY L. HENDERSON

STATE OF MISSOURI	)	
	)	ss.
COUNTY OF COLE	)	

COMES NOW STACY L. HENDERSON and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation in Memorandum form*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

STACY L. HENDERSON

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 28th day of October 2026.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2029
Commission Number: 12412070

Notary Public