

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

In the Matter of The Empire District Electric Company's)
Request for Authority to File Tariffs Increasing Rates for)
Electric Service Provided To Customers in its)
Missouri Service Area)

Case No. ER-2019-0374

STAFF RESPONSE TO COMMISSION

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, on behalf of all parties to this proceeding, and for its *Response to Commission* in this matter hereby states:

The Commission ordered all parties to file a list of the elements which should be included in an accounting authority order (AAO) no later than April 3, 2020. Staff asks that the Commission include:

- a. The depreciation expense as reflected in Staff's True-up EMS exhibit- Reg. Liability;
- b. All non-fuel/non-labor operating and maintenance expenses included in Staff's True-up EMS Exhibit- Reg. Liability;
- c. All labor charges for maintaining and operating the Asbury Plant included in Staff's True-up EMS Exhibit- Reg. Liability;
- d. Property taxes assigned to the Asbury Plant included in Staff's True-up EMS exhibit- Reg. Liability;
- e. Fuel inventories assigned to the Asbury Plant included in Staff's True-up EMS exhibit- Reg. Liability;
- f. The rate of return on the Asbury Plant included in Staff's True-up EMS exhibit- Reg. Liability; and
- g. Any costs associated with the retirement of the Asbury Plant- Non-Empire labor excluded- Reg. Asset.

WHEREFORE, Staff prays that the Commission will accept Staff's *Response*; and grant such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

/s/ Whitney Payne

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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 3rd day of April, 2020, to all counsel of record.

/s /Whitney Payne