
October 22, 2020

Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

**RE: The Empire District Electric Company (“Liberty-Empire”)
Fuel & Purchase Power Adjustment Clause (“FAC”) – Periodic Change and True-Up
Case Nos. ER-2021-0097 and EO-2021-0098**

Dear Judge Woodruff:

On October 1, 2020, and in accordance with Commission Rule 20 CSR 4240-20-090(8), Liberty-Empire initiated a new case with an ER designation and provided the FAC Direct Testimony of Charlotte T. Emery and a revised tariff sheet. Additionally, in accordance with Commission Rule 20 CSR 4240-20-090(9), Liberty-Empire initiated a new case with an EO designation and provided the FAC True-Up Direct Testimony of Charlotte T. Emery and additional information required by the Commission’s Rule.

Since the initial submissions were made, Liberty-Empire worked with the Staff of the Commission and the Office of the Public Counsel on changes. In this regard, the Amended FAC True-Up Direct Testimony of Charlotte T. Emery is being submitted, as well as a revised tariff sheet.

True-Up Filing (EO-2021-0098): page three of the testimony was amended to reflect accurate accumulation period dates for the true-up portion of the FAC rate (from March 1, 2020-August 31, 2020 to March 1, 2019-August 31, 2019).

FAC Filing (ER-2021-0097): the Missouri Energy Ratio on the tariff sheet has been changed to be consistent with tariff specifications, and footnotes were added to explain the calculation discrepancies (Schedule CTE-2, page 1). Additionally, the formula for the accumulation period Total Missouri Energy Ratio was updated to ensure that it is being calculated according to tariff specifications, and the formula for the accumulation period Total Missouri Energy Ratio was updated on the workpaper labeled 08-2020 Missouri Fuel Adjustment Worksheet (Schedule CTE-2, page 2).

Lastly, at the request of Staff and OPC, an explanation is being provided regarding the swing in the Missouri Energy Ratio. The Missouri Energy Ratio increased in the months of June, July, and August. This increase occurred because three of the four GFR customers opted to terminate service as of June 1, 2020. As such, Missouri Retail kwh Sales account for a larger portion of the overall Total System kwh Sales.

Please bring these filings to the attention of the Commissioners and the appropriate Commission personnel, and please do not hesitate to contact me with any questions or concerns you may have regarding these filings.

Sincerely,

Diana C. Carter