

BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

Received  
on

**MAY 31 2011**

In the Matter of The Empire District Electric Company )  
Filing Compliance Reports and Information as )  
Prescribed by Commission Order Dated December 3, )  
2010, in Docket No. 06-GIMX-181-GIV )

by  
State Corporation Commission  
of Kansas

Docket No. 11-EPDE- 798 -CPL

**COMPLIANCE FILING OF**  
**THE EMPIRE DISTRICT ELECTRIC COMPANY**

COMES NOW The Empire District Electric Company ("Empire") and pursuant to the requirements of the Commission's Order issued in Docket No. 06-GIMX-181-GIV ("181 Docket") on December 3, 2010, Empire is providing the following information in compliance with the Commission's Order:

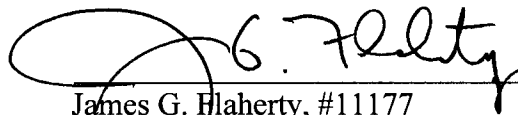
1. Cost Allocation Manual for 2010, attached (requirement A1), Exhibit 1<sup>1</sup>;
2. FERC Form No. 60 is not required for Empire (requirement A2);
3. Non-regulated activities of the Empire companies comprise less than 2% of the business assets and revenues which meet the *de minimis* exception for requirements B1 through B6 (requirements B1-B6);
4. Organization Chart as of 12/31/2010 in lieu of requirements B1 through B6 (requirements B1-B6), Exhibit 2<sup>1</sup>; and
5. To the best of Empire's knowledge, the following is a list of copyrighted analyst reports issued with respect to Empire (requirement C3):

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<sup>1</sup>The Cost Allocation Manual (Exhibit 1) and Organizational Chart (Exhibit 2) have been designated as confidential pursuant to K.S.A. 66-1220a and K.A.R. 81-1-221a. The documents contain confidential commercial information of Empire that has not been disclosed to the public and if disclosed could cause harm to the company.

- b. Jefferies Report dated April 20, 2011;
- c. Jefferies Report dated February 7, 2011;
- d. ValuEngine Report dated March 14, 2011;
- e. UBS Report dated February 4, 2011;
- f. Stifel Nicolas Report dated April 1, 2011;
- g. Stifel Nicholas Report dated March 11, 2011;
- h. Fitch Ratings Report dated March 24, 2011;
- i. Standard & Poor's Report dated March 10, 2011;
- j. Jefferies Report dated May 2, 2011; and
- k. Moody's Investors Service Report dated April 14, 2011.

WHEREFORE, Empire requests the information provided be accepted by the Commission in compliance with the reporting requirements in the 181 Docket.



James G. Flaherty, #11177

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(785) 242-1279, facsimile

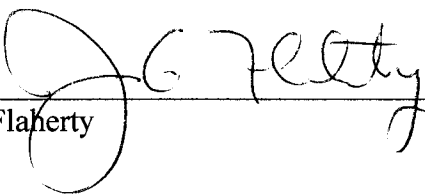
[jflaherty@andersonbyrd.com](mailto:jflaherty@andersonbyrd.com)

Attorneys for The Empire District Electric Company

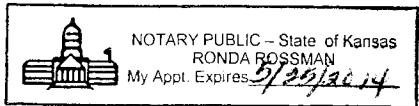
**VERIFICATION**

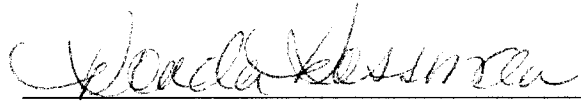
STATE OF KANSAS            )  
  )ss:  
COUNTY OF FRANKLIN    )

James G. Flaherty, of lawful age, being duly sworn upon oath, deposes and says that he is attorney for the within named applicant, that he has read the above and foregoing Compliance Filing, and the statements contained therein are true.

  
\_\_\_\_\_  
James G. Flaherty

SUBSCRIBED AND SWORN to before me this 31<sup>st</sup> day of May, 2011.



  
\_\_\_\_\_  
Notary Public

Appointment/Commission Expires:

# EXHIBIT 1

*CONFIDENTIAL*

# EXHIBIT 2

*CONFIDENTIAL*