

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Received
on

NOV 07 2011

In the Matter of the Application of The)
Empire District Electric Company for)
Approval to Make Certain Changes in Its)
Charges for Electric Service.)

by
State Corporation Commission
of Kansas

Docket No. 11-EPDE-856-RTS

CURB'S LIST OF CONTESTED ISSUES

The Citizens' Utility Ratepayer Board (CURB) submits its list of contested issues for the evidentiary hearing scheduled for November 21 – 23, 2011, in the above-captioned matter:

1. Rate base adjustments: which to accept, reject
2. Expense adjustments: which to accept, reject
3. Prudence/Imprudence and whether imputation to Empire is appropriate
4. Energy Efficiency Rider: whether pre-implementation costs should be rate based or put in rider
4. Executive Compensation: whether ratepayers should subsidize
5. Rate case expense amortization: how many years to amortize
6. Rate design: which design to adopt

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'Niki Christopher', written over a horizontal line.

David Springe #15619

Niki Christopher #19311

C. Steven Rarrick #13127

Citizens' Utility Ratepayer Board

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VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

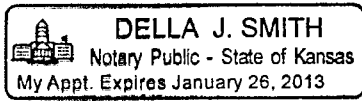
I, Niki Christopher, of lawful age, being first duly sworn upon her oath states:

That she is an attorney for the Citizens' Utility Ratepayer Board; that she has read the above, and foregoing document and upon information and belief, states that the matters therein appearing are true and correct.



Niki Christopher

SUBSCRIBED AND SWORN to before me this 7th day of November, 2011.


Notary Public

My Commission expires: 01-26-2013.

CERTIFICATE OF SERVICE

11-EPDE-856-RTS

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was placed in the United States mail, postage prepaid, electronic service, or hand-delivered this 7th day of November, 2011, to the following:

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