

June 28, 2019

VIA ELECTRONIC FILING

Mr. Morris Woodruff, Secretary Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102

RE: Liberty-Empire's 2019 Utility Resource Filing Pursuant to 4 CSR 240-22 File No. EO-2019-0049

Dear Judge Woodruff:

Pursuant to Missouri Public Service Commission ("Commission") Rules 4 CSR 240-22.010 through 4 CSR 240-22.080, the Commission's Order Granting Application for Variance, and the Commission's Order Granting Extension to File, The Empire District Electric Company, a Liberty Utilities Company ("Liberty-Empire") hereby submits information in compliance with Chapter 22, the Commission's Electric Utility Resource Planning report requirements (sometimes referred to as the "integrated resource plan" or "IRP").

This IRP filing contains eight volumes, including an executive summary volume, a volume dedicated to the Missouri IRP filing requirements and an Index of Rule Compliance, and six technical volumes. The ordering and subject matter of the IRP volumes closely correspond to the IRP Rule sections. The technical volumes contain the rule reference and the Company's response as appropriate. The responses to Special Contemporary Issues can be found in Volume 6: Integrated Resource Plan and Risk Analysis.

Volume 1: Executive Summary
Volume 2: Missouri Filing Requirements and an Index of Rule Compliance
Volume 3: Load Analysis and Load Forecasting (4 CSR 240-22.030)
Volume 4: Supply-Side Resource Analysis (4 CSR 240-22.040)
Volume 4.5: Transmission and Distribution Analysis (4 CSR 240-22.045)
Volume 5: Demand-Side Resource Analysis (4 CSR 240-22.050)
Volume 6: Integrated Resource Plan and Risk Analysis (4 CSR 240-22.060)
Volume 7: Resource Acquisition Strategy Selection (4 CSR 240-22.070)

Please note that portions of this filing have been designated as Confidential in accordance with Commission Rule 4 CSR 240-2.135(2)(A) and Highly Confidential in accordance with Commission Rule 4 CSR 240-2.135(4). A motion for a protective order regarding the Highly Confidential material has been filed.



Moreover, in accordance with Commission Rule 4 CSR 240-22.080(2)(A), attached hereto is a document expressing commitment to the approved preferred resource plan and resource acquisition strategy signed by Mr. David R. Swain, President, Central Region of Liberty-Empire. This document is also found in IRP Volume 7.

Please direct communications concerning this filing to myself and to:

Mrs. Jill Schwartz Liberty Utilities 602 S. Joplin Avenue P.O. Box 127 Joplin, Missouri 64802 Phone: (417) 626-5941 E-mail: jschwartz@libertyutilities.com

Please bring this filing to the attention of the Commissioners and the appropriate Commission personnel.

Sincerely,

Diana Carter

Enclosures

cc: Office of the General Counsel Office of the Public Counsel Missouri Division of Energy Renew Missouri - Andrew Linhares

THE EMPIRE DISTRICT ELECTRIC COMPANY, A LIBERTY UTILITIES COMPANY (LIBERTY-EMPIRE) 2019 INTEGRATED RESOURCE PLAN

COMMITMENT TO THE

APPROVED PREFERRED RESOURCE PLAN

FILE NO. EO-2019-0049

In accordance with Missouri Public Service Commission Rule 4 CSR 240-22, The Empire District Electric Company, a Liberty-Utilities Company (Liberty-Empire) developed, described and documented, and now officially adopts for implementation the preferred resource plan and resource acquisition strategy contained in this filing.

As required, the adopted resource acquisition strategy consists of a preferred resource plan; an implementation plan; and a set of contingency resource plans. I hereby further commit to provide the notice called for by Commission Rule 4 CSR 240-22.080(12), if Empire should, between triennial compliance filings, decide to take actions materially inconsistent with the preferred resource plan.

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David R. Swain President, Central Region

6-27-19

Dated