

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

In the Matter of the 2021 RES Compliance)
Report and 2022 RES Compliance Plan of The) Case No. EO-2022-0282
Empire District Electric Company d/b/a Liberty)

RESPONSE TO COMMISSION ORDER

COMES NOW The Empire District Electric Company d/b/a Liberty, and for its Response to Commission Order, respectfully states as follows to the Missouri Public Service Commission (“Commission”):

1. On April 14, 2022, Liberty submitted its 2021 Renewable Energy Standards (“RES”) Compliance Report and 2022-2024 RES Compliance Plan, pursuant to Commission Rule 20 CSR 4240-20.100(8).
2. The Commission’s Rule requires the Staff of the Commission (“Staff”) to file a report about Liberty’s RES Compliance Report and Plan, and offers other interested persons or entities an opportunity to file comments.
3. Staff filed its report herein on June 1, 2022. Staff’s report recommends that Liberty supplement its RES filing with updates on three alleged deficiencies:
 - a. The Renewable Energy Credits (“REC”) generated by owned facilities and the associated value is lacking information for all owned facilities in Section D.
 - b. Reported RECs sold information differs between Section E of the report and Attachment 3.
 - c. The calendar year retail rate impact calculation reported in Section P does not include all resources used for compliance in the year.
4. On June 10, 2022, the Commission issued its *Order Establishing Time to Respond to Staff’s Report*, stating as follows: “Before deciding whether any additional information is required or whether any concerns or deficiencies need to be addressed, the Commission will establish a time for the filing of responses to Staff’s report.”

5. Liberty reviewed its initial submission, worked with Staff, and revised the below documents to address Staff's three alleged deficiencies:
 - a. RES Report
 - i. report document
 - ii. attachment 3 – REC report
 - iii. attachment 9 – RRI calculation
 - b. RES Compliance Plan
 - i. plan document
 - ii. attachment 2 – REC report
 - iii. attachment 3 – RRI calculation
6. On this date, Liberty will submit a revised 2021 RES Compliance Report and revised 2022-2024 RES Compliance Plan herein. For ease of reference, the complete 2021 RES Report and all attachments and the complete 2022-2024 RES Compliance Plan and all attachments will be submitted, including those sections that were not revised to address Staff's concerns.

WHEREFORE, Liberty submits this Response to Commission Order. Liberty requests such relief as is just and proper under the circumstances.

Respectfully submitted,

/s/ Diana C. Carter
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CERTIFICATE OF SERVICE

I hereby certify that the above document was filed in EFIS on this 8th day of July, 2022, with a copy sent by electronic mail to all counsel of record.

/s/ Diana C. Carter