



Liberty Utilities (The Empire District Electric Company)

Case No. ER-2021-0312

Office Public Counsel Data Request - 8113

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Response Date: 2021-12-13

Request No. 8113

Witness/Respondent: Tim Wilson

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REQUEST:

Please provide each and every study of the effect of retiring Empire's Asbury plant on the reliability of Empire's resources to meet its customers' electricity needs at all times. If no such studies were completed, please explain in detail why not.

RESPONSE:

At least 6 months prior to retiring Asbury, Empire was required to submit the request for retirement to Southwest Power Pool (SPP) for studies relating to reliability. These studies include a review of the steady state and dynamic impacts directly related to the retirement of the asset as well as identify any upgrades to accommodate the asset retirement from the transmission system. SPP performed these studies, and Empire does not have possession of the studies. SPP, as the independent system operator (ISO), reliability coordinator (RC) and tariff administrator for SPP, is responsible for ensuring reliability, including as it relates to unit retirement and SPP resource adequacy (RA). As a note, Section 7.2 of the SPP Bylaws states that the Regional State Committee (RSC), which is comprised of one designated commissioner from each regulatory commission having jurisdiction over an SPP member, will determine the approach for resource adequacy across the entire region. Empire has consistently used SPP guidelines to determine the necessary capacity levels to meet RA requirements.