

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

In the Matter of a Determination of Special	)	
Contemporary Resource Planning Issues to be	)	
Addressed by The Empire District Electric	)	File No. EO-2019-0066
Company in its Next Triennial Compliance	)	
Filing or Next Annual Update Report	)	

**EMPIRE’S OBJECTIONS AND COMMENTS REGARDING  
SUGGESTED SPECIAL CONTEMPORARY RESOURCE PLANNING ISSUES**

COMES NOW The Empire District Electric Company (“Empire” or “Company”), a Liberty Utilities company, and, pursuant to Rule 4 CSR 240-22.080(4)(B), provides these Objections and Comments Regarding Suggested Special Contemporary Resource Planning Issues. In this regard, Empire respectfully states as follows to the Missouri Public Service Commission (“Commission”):

1. This file was opened to facilitate the process established by Rule 22.080(4) regarding evolving electric resource planning issues – or special contemporary issues (“SCIs”).
2. On September 14, 2018, the Staff of the Commission (“Staff”), the Missouri Department of Economic Development – Division of Energy (“DE”), the Office of the Public Counsel (“OPC”), the National Resources Defense Council (“NRDC”), and the Sierra Club filed suggested SCIs for Empire.
3. Pursuant to Rule 22.080(4)(C), by no later than November 1, 2018, the Commission must issue an order containing a list of SCIs for Empire to analyze and document in its next integrated resource planning (“IRP”) triennial compliance filing. Alternatively, the Commission may issue an order stating that there are no SCIs to be addressed at this time.
4. Empire does not object to any of the five SCIs suggested by Staff. As detailed on the attached Appendix A, however, Empire objects to the inclusion of Issues 9-12 suggested by the

Sierra Club, Issues 1 and 3 suggested by the NRDC, Topic 1 suggested by OPC, and Issues 1 and 8 of the 18 SCIs suggested by DE.

5. Empire requests that the Commission apply a reasonableness standard in arriving at its list of special contemporary issues for Empire to consider and analyze for its upcoming IRP filing. Any ordered SCI should be reasonably related to Empire's particular resource planning, should not already be covered or contemplated by the IRP rules, and should not create an unnecessary or costly burden. The list of SCIs ordered by the Commission for consideration and analysis by Empire in its upcoming IRP filing should be straightforward, specific to Empire and its planning process, and appropriately limited in number and scope, so that the issues may be adequately analyzed and the Company's resources used wisely.

WHEREFORE, Empire respectfully submits its objections and comments regarding the special contemporary resource planning issues suggested by the Sierra Club, NRDC, DE, and OPC. Empire requests such relief as is just and proper under the circumstances.

BRYDON, SWEARENGEN & ENGLAND P.C.

By:

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### **CERTIFICATE OF SERVICE**

I hereby certify that the above and foregoing document was filed in EFIS, notifying all counsel of record of the filing, and that a copy of the same was sent via electronic mail on this 1<sup>st</sup> day of October, 2018, to all counsel of record.

/s/ Diana C. Carter