

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of The)
Empire District Electric Company for) File No. EA-2019-0010
Certificates of Convenience and Necessity)
Related to Wind Generation Facilities.)

JOINT POSITION STATEMENT OF NRDC AND SIERRA CLUB

The Natural Resources Defense Council (“NRDC”) and Sierra Club state as follows concerning the issues presently set for hearing.

Issue 1. Does the evidence establish that the Kings Point, Neosho Ridge, and North Fork Ridge wind projects for which The Empire District Electric Company ("Empire") is seeking certificates of convenience and necessity (“CCN”) are “necessary or convenient for the public service” within the meaning of that phrase in section 393.170, RSMo.?

Position: The evidence establishes the convenience and necessity of the wind farms. They are necessary to keep Empire in compliance with the Renewable Energy Standard after expiration of the company’s existing wind PPAs, and they are the most cost-effective way to meet customers’ energy needs. The *Tartan* criteria of need, financial ability, economic feasibility, qualifications, and public interest are met.

Issue 2. For each CCN the Commission grants, what conditions, if any, should the Commission deem to be reasonable and necessary, an impose?

Position: A market protection plan to reduce customer risk and protections against eagle and bat mortality at the sites should be provided. NRDC and Sierra Club cannot be more precise at this time about the content of these protections since the situation is still fluid, with ongoing negotiations among the parties.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and sent by email on this 22nd day of March, 2019, to all counsel of record.

/s/ Henry B. Robertson
Henry B. Robertson