

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

In the Matter of The Empire District Electric Company’s)
Submission of its Interim Report Regarding)
Participation in the Southwest Power Pool, Inc.) Case No. EO-2012-0269

INFORMATIONAL FILING REGARDING EMPIRE’S PARTICIPATION IN SPP

COMES NOW The Empire District Electric Company, a Liberty Utilities company (“Liberty-Empire” or the “Company”), and for its Informational Filing Regarding Empire’s Participation in SPP, respectfully states as follows to the Missouri Public Service Commission (“Commission”):

1. On March 1, 2017, the Commission issued its *Order Modifying Stipulation and Agreement* herein. As recited therein, this case concerns Liberty-Empire’s continued membership in the Southwest Power Pool (“SPP”).

2. On September 11, 2013, the Commission approved a stipulation and agreement that provided for Empire’s continued participation in SPP through August 1, 2019. That stipulation and agreement contained provisions that required Empire to undertake a cost/benefit study and prepare an interim report. On February 15, 2017, a joint motion was filed asking the Commission to modify the 2013 stipulation and agreement, delay the production of the interim report for three years, and extend Liberty-Empire’s authorization to participate in SPP for the same three-year period.

3. With its *Order Modifying Stipulation and Agreement*, the Commission provided that the “interim and conditional approval of The Empire District Electric Company’s membership in the Southwest Power Pool, described in Section II.A(1) of the Stipulation and Agreement, is extended by three years to August 1, 2022.” The *Order* also provides that “(a)ll other dates

associated with the Interim Report and Interim Approval are also extended by three years” and that Liberty-Empire “shall file a 2021 Interim Report, containing a completed cost/benefit study and its case for whether to continue to participate in the Southwest Power Pool by April 30, 2021.”

4. With regard to the cost/benefit study to be filed by April 30, 2021, Liberty-Empire is to finalize its analysis plan after consultation with the parties and provide regular reports of progress, if requested. This Informational Notice is designed to comply with that requirement.

5. Liberty-Empire intends to obtain an estimate of the benefits and costs of remaining in the SPP by looking at the load ratio share approximation methodology, as suggested by the Commission in its October 11, 2019, *Order* regarding Evergy in Commission Case No. EO-2012-0135.

6. SPP has produced a number of studies that evaluate the costs and benefits of RTO participation. As an approximation of the costs and benefits to Liberty-Empire’s SPP participation, the Company will ask SPP to calculate a load ratio share of the costs and benefits to the Missouri portion of the SPP footprint, specifically the Empire District zone for both the Value of Transmission Study and Integrated Marketplace Benefits studies. In addition, for the Missouri portion of the SPP footprint, the Empire District zone’s specific cost and benefit results can be provided from the Regional Cost Allocation Review II study.

WHEREFORE, Liberty-Empire submits this Informational Filing Regarding Empire’s Participation in SPP. Liberty-Empire requests such relief as is just and proper under the circumstances.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that the above document was filed in EFIS on this 3rd day of February, 2020, with notification of the same being sent to all counsel of record.

/s/ Diana C. Carter