

**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-2021-0066
Company in its Next Triennial Compliance	)	
Filing or Next Annual Update Report	)	

**RESPONSE TO COMMISSION ORDER**

COMES NOW The Empire District Electric Company (“Liberty”) and provides this Response to Commission Order regarding the *Order Directing Response* issued on October 20, 2020, by 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”) – for Liberty to analyze and document in its next integrated resource planning (“IRP”) annual update report.

2. Liberty submitted its most recent triennial compliance filing in 2019, and its next triennial compliance filing will be made in 2022. There are important distinctions between the IRP triennial compliance filing and the IRP annual update report that will address the SCIs ordered in this proceeding and be submitted by Liberty in 2021.

3. On October 20, 2020, the Commission suggested the following SCI: “evaluate the options of potential upgrades to the utility’s distribution system needed in light of FERC Order 2222.” Before unilaterally directing Liberty to address the issue, the Commission afforded Liberty the opportunity to respond regarding its inclusion.

4. To the extent applicable to an annual update, Liberty has no objection to this issue being ordered as a SCI herein, for Liberty to analyze and document in its 2021 IRP annual update report.

WHEREFORE, Liberty submits this Response to Commission Order and 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 25<sup>th</sup> day of October, 2020, with notice of the same sent to all counsel of record.

/s/ Diana C. Carter