



Liberty Utilities (The Empire District Electric Company)

Case No. ER-2021-0312

Office Public Counsel Data Request - 3002

Data Request Received: 2021-08-16

Response Date: 2021-09-16

Request No. 3002

Witness/Respondent: Todd Mooney

Submitted by: David Murray, david.murray@opc.mo.gov

REQUEST:

Please provide each and every valuation analysis (e.g. analysis done for purposes of asset/goodwill impairment tests, possible sales or acquisitions and mergers), along with supporting workpapers (including, but not limited to, all electronic files in their original software format, e.g. Excel), whether done internally or by a third party, performed since September 30, 2019, as it relates to Liberty Utilities Company's and/or The Empire District Electric Company's utility assets. Update as new analyses become available.

RESPONSE: **Designated Attachment Confidential 20 CSR 4240-2.135(2)(A)5**

By email to counsel, objection served 8/26/2021: Empire objects to this DR on the bases that it is vague, overly broad, not proportional to the needs of the case considering the totality of the circumstances, unduly burdensome, and seeks information that is not relevant or reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to this objection and without waiving the same, Empire responds as follows:

Attachments:

- "LU Quants as at Sept 30 2020 Empire.xlsx"
- "Empire Sept 30 v 3 2.16.2021.xlsx"
- "Confidential LU Goodwill and Fixed Asset Impairment Memo Q4 2020 Empire Extract.pdf"
