

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

In the Matter of the Application of The Empire District)	
Electric Company for Certificates of Convenience and)	Case Nos. EA-2019-0010
Necessity Related to Wind Generation Facilities)	and EA-2019-0118

NOTICE OF FILING

COMES NOW The Empire District Electric Company (“Empire” or “Company”), and for its Notice of Filing, respectfully states as follows to the Missouri Public Service Commission (“Commission”):

1. The Commission issued its Report and Order herein on June 19, 2019, effective June 29, 2019. Ordered paragraph 6f of the Report and Order provides as follows:

Empire shall file a copy of the SPP Definitive Interconnection System Impact Studies within 30 days of receipt. In its subsequent quarterly report, Empire shall address any results of the study that are material changes in assumptions or costs related to the Wind Projects. Empire shall also include a discussion of any sensitivity or curtailment issues raised by SPP in the study. Empire shall also include a proposed plan to address any issues related to those changes in assumptions, costs or curtailment . . .

2. Pursuant to SPP’s Generator Interconnection Procedures (“GIP”), the SPP Definitive Interconnection System Impact Studies (“DISIS”) includes two phases: (1) thermal and voltage analysis; and (2) stability analysis and refresh of thermal and voltage analysis for withdrawn applications. Currently, the wind projects are between the two phases, at Decision Point 1, per the diagram of the SPP GIP attached hereto as Appendix A. Upon completion of the DISIS, a Facilities Study will then be conducted to provide study-level cost estimates for any new upgrades identified in the study.

3. On October 29, 2020, an Excel workbook representing DISIS Phase One was issued by SPP. Empire believes the above referenced provision of the Report and Order requires Empire to file the complete DISIS within 30 days of receipt.

4. For transparency, attached hereto as Appendix B is the Excel workbook provided by SPP for DISIS Phase One, including the steady-state thermal and voltage analysis, short circuit ratio, and cost estimates for identified upgrades. Empire will file the remaining portions of the SPP DISIS as they are received and will, pursuant to ordered paragraph 6f of the Commission's Report and Order, address the following in its quarterly construction report prepared following the issuance by SPP of the complete DISIS: any results of the study that are material changes in assumptions or costs related to the wind projects, any sensitivity or curtailment issues raised by SPP in the study, and a proposed plan to address any issues related to those changes in assumptions, costs, or curtailment.

5. Empire notes that it is still reviewing and assessing the spreadsheet attached hereto as Appendix B. At this time, Empire believes that certain facility ratings will need to be updated, addressing the current overloads shown in the results. Additionally, Empire will be unable to fully assess any possible assumption or cost changes or other issues until the GIP is followed and SPP issues the complete DISIS.

WHEREFORE, Empire submits this Notice of Filing and requests such relief as is just and proper under the circumstances.

Respectfully submitted,

THE EMPIRE DISTRICT ELECTRIC COMPANY

/s/ Diana C. Carter

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CERTIFICATE OF SERVICE

I hereby certify that the above document was filed in EFIS on this 5th day of November, 2020, with notification of the same being sent to all counsel of record.

/s/ Diana C. Carter