

**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 Company) **File No. EO-2023-0102**
d/b/a Liberty in its Next Triennial Compliance)
Filing or Next Annual Update Report)

**STAFF SUGGESTIONS FOR SPECIAL CONTEMPORARY
RESOURCE PLANNING ISSUES**

COMES NOW, Staff of the Missouri Public Service Commission, by and through the undersigned counsel, and for its response to the Commission’s September 13, 2022, *Order Opening A File Regarding Special Contemporary Resource Planning Issues And Offering An Opportunity To File Suggestions*, respectfully states:

1. Pursuant to Commission Rule 20 CSR 4240-22.080(4)(A), Staff suggests The Empire District Electric Company d/b/a Liberty (“Liberty”) address the following special contemporary issues in its next annual update report¹:

A. The Company shall provide details of its plans to utilize securitization. Details shall include but are not limited to: 1) type of items to be securitized; 2) explanation for need of securitization for each item; 3) how it plans to utilize securitization for each item; 4) estimated costs of securitized items; 5) comparison of ratepayer costs and benefits.

B. The Company shall provide detailed analysis comparing ratepayer risks and shareholder risks for additional generation resources which are not

¹ The purpose of the special contemporary issues lists is to ensure that evolving regulatory, economic, financial, environmental, energy, technical, or customer issues are adequately addressed by each utility in its electric resource planning. Each special contemporary issues list will identify new and evolving issues but may also include other issues such as unresolved deficiencies or concerns from the preceding triennial compliance filing. 20 CSR 4240-22.080(4).

required to meet federal, state, or RTO requirements. This is consistent with the Commission's *Order Establishing Special Contemporary Resource Planning Issues* in Case No. EO-2022-0057.

C. Given the recent COVID pandemic and the Winter Storm Uri weather event, the Company shall provide details of its plan for handling future emergency events such as these. The details provided shall give a clear plan for maintaining supply-side resource generation and public welfare during emergency events.

WHEREFORE, Staff suggests Liberty address in its next annual update report the special contemporary issues set forth above.

Respectfully submitted,

/s/ Don Cosp

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**Attorney for the Staff of the
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile, or electronically mailed to all parties and/or counsel of record on this 15th day of September, 2022.

/s/ Don Cosp