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

In the Matter of the Petition of The Empire	)	
District Electric Company d/b/a Liberty to	)	
Obtain a Financing Order that Authorizes	)	Case No. EO-2022-0040
the Issuance of Securitized Utility Tariff	)	
Bonds for Qualified Extraordinary Costs	)	
In the Matter of the Petition of The Empire	)	
District Electric Company d/b/a Liberty to	)	
Obtain a Financing Order that Authorizes	)	Case No. EO-2022-0193
the Issuance of Securitized Utility Tariff	)	
Bonds for Energy Transition Costs Related	)	
to the Asbury Plant	)	

## PUBLIC COUNSEL'S RESPONSE TO ORDER DIRECTING FILINGS

**COMES NOW** the Office of Public Counsel (Public Counsel) and in response to the Commission's Order Directing parties to file by June 9, 2022, detailed calculations supporting their proposed disallowances or referenced a calculation in their testimony without including that calculation prefiles the below-described schedules attached hereto:

To the prefiled rebuttal testimony of OPC witness Lena M. Mantle:

- (Ex. 202C) Schedule Imm-r-7C (Sheet 1—calculations of OPC's recommendation the Commission allow Empire to securitize \$120,046,768 found on page 2 of her rebuttal testimony, and Sheet 2—calculation of the impacts of OPC's recommendations for Storm Uri) and
- (Ex. 203C) Schedule lmm-r-8C (calculation of the net revenues the Asbury plant could have generated in February 2021 found on page 11 of her rebuttal testimony).

To the prefiled surrebuttal testimony of OPC witness John A. Robinett (EO-2022-0040):

• (Ex. 212C) Schedule JAR-S-4C Riverton 11 Disallowance (Calculations related to the Riverton disallowance found on pages 4-6 of his surrebuttal testimony).

To the prefiled surrebuttal testimony of OPC witness David Murray:

• (Ex. 207) Schedule DM-R-3 Footnotes 10 & 11 workpapers (Workpapers referenced in footnotes 10 & 11 of his rebuttal testimony).

Respectfully,

/s/ Nathan Williams

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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 counsel of record this 9<sup>th</sup> day of June 2022.

/s/ Nathan Williams