

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

In the Matter of the 2021 RES Compliance Report     )  
and 2022 RES Compliance Plan of The Empire        )  
District Electric Company d/b/a Liberty             )     **File No. EO-2022-0282**

**STAFF REPORT ON LIBERTY’S 2021 RES COMPLIANCE REPORT  
AND 2022-2024 RES COMPLIANCE PLAN**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and for its *Report* in this matter hereby states:

1. On April 14, 2022, The Empire District Electric Company d/b/a Liberty (“Liberty”) filed its 2021 Renewable Energy Standard (“RES”) Compliance Report and 2022-2024 RES Compliance Plan as required by 20 CSR 4240-20.100(8).

2. The Commission ordered Staff to review the Report and Plan and to file a report within 45 days, which is May 31, 2022.

3. Staff completed its review of Liberty’s 2021 RES Compliance Report and identified several deficiencies.

- The Renewable Energy Credits (“REC”) generated by owned facilities and the associated value is lacking information for all owned facilities in Section D.
- Reported RECs sold information differs between Section E of the report and Attachment 3.
- The calendar year retail rate impact calculation reported in Section P does not include all resources used for compliance in the year.

Staff recommends that Liberty supplement its filing with updates to these sections. Staff’s Memorandum regarding the 2021 RES Compliance Report, attached hereto as

Appendix A and incorporated herein by reference, outlines the specific details of Staff's investigation and findings.

4. Staff reviewed Liberty's 2022-2024 RES Compliance Plan and found no deficiencies. However, Staff did note that Liberty made errors in its Retail Rate Impact ("RRI") calculation and recommends the Commission order Liberty to file an updated RRI calculation. Staff's Memorandum regarding the 2022-2024 RES Compliance Plan, attached hereto as Appendix B and incorporated herein by reference, outlines the specific details of Staff's investigation and findings.

**WHEREFORE**, Staff hereby tenders its Staff Report on Liberty's 2021 RES Compliance Report and 2022-2024 RES Compliance Plan and recommends that Liberty supplement its 2021 RES Compliance Report with updates to Sections D, E, and P. Regarding Liberty's 2022-2024 RES Compliance Plan, although Staff found no deficiencies, Staff discovered an error in Liberty's RRI calculation and recommends the Commission order Liberty to update its RRI calculation.

Respectfully submitted,

**/s/ Don Cospers**

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all parties and/or counsel of record this 1<sup>st</sup> day of June, 2022.

**/s/ Don Cosper**