



**The Empire District Electric Company**  
**A Liberty Utilities Company**  
Case No. ER-2019-0374  
OPC Data Request – 1013

Data Request Received: 03/09/20  
Request No. 1013  
Submitted by: Robert Schallenberg

Date of Response: 3/24/2020  
Respondent: Mark Timpe

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**REQUEST:**

Does LUCo/LUSC have a promissory note platform that it uses when debt financing its affiliates? If so, please provide the following:

- a. a copy of the policy for this platform;
- b. each and every document of the decision for this platform;
- c. a copy of each and every document related to (i) Liberty-Empire's officers, (ii) Liberty-Empire's board of directors, (iii) LUCo's officers, and (iv) LUCo's board of directors approval of this platform.

**OBJECTION:**

Liberty-Empire objects to this DR on the bases that it is vague, overbroad, and 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 and without waiving this objection, Liberty-Empire will provide a timely response to this DR.

**RESPONSE:**

While it is unclear what the inquirer means by "promissory note platform," it has been and continues to be the Company's practice to provide debt financing for its subsidiaries and to document the underlying debt obligations utilizing unsecured promissory notes.