



The Empire District Electric Company

A Liberty Utilities Company

Case No. ER-2019-0374

OPC Data Request – 1038

Data Request Received: 04/03/20

Request No. 1038

Date of Response: 04/13/2020

Respondent: Mark Timpe

Submitted by: Robert Schallenberg

REQUEST:

What right does Empire have to accessing LUCo's credit facility for own specific needs? If it has none, does any entity other than LUCo have any right to access LUCo's credit facility.

RESPONSE:

This response is provided subject to and without waiving the previously served objections.

Neither Empire nor any other LUCo subsidiary is listed as a co-borrower under the LUCo credit facility. Therefore, no entity other than LUCo may draw on or issue letters of credit under LUCo's credit facility. However, Empire's commercial paper program is back-stopped by LUCo's credit facility, without which it could not issue commercial paper. While Empire and LUCo's other subsidiaries do not have direct access to the LUCo credit facility, they do receive advances from LUCo.