



Liberty Utilities (The Empire District Electric Company)

Case No. EA-2023-0131

Office Public Counsel Data Request - 0008

Data Request Received: 2023-10-20

Response Date: 2023-11-09

Request No. 0008

Witness/Respondent: Shaen Rooney

Submitted by: Nathan Williams, Nathan.Williams@opc.mo.gov

REQUEST:

When did Liberty first become aware of the generator replacement process of section 3.9.1(ii) in Attachment V (Generator Interconnection Procedures (GIP)) of Southwest Power Pool Inc.'s (SPP) Open Access Transmission Tariff (Tariff)?

RESPONSE:

Liberty has been aware of Section 3.9.1(ii) in Attachment V of the Southwest Power Pool ("SPP") Open Access Transmission Tariff ("OATT") since its inception. As voting members of the Transmission Working Group ("TWG"), the Regional Tariff Working Group ("RTWG"), and the Market Operations Policy Committee ("MOPC"), Liberty supported Revision Request ("RR") 393 *Generator Replacement Process* through the working group process as detailed below:

Working Group	Revision Request	Voting Attendee	Date	Liberty Vote	Vote Results
Regional Tariff Working Group	393	Todd Tarter	12/19/2019	Support	Passed
Transmission Working Group	393	Nate Morris	12/18/2019	Support	Passed
Market Operations Policy Committee	393	Aaron Doll	1/14/2020	Support	Passed



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Case No. EA-2023-0131

Office Public Counsel Data Request - 0010

Data Request Received: 2023-10-20

Response Date: 2023-12-01

Request No. 0010

Witness/Respondent: Shaen Rooney

Submitted by: Nathan Williams, Nathan.Williams@opc.mo.gov

REQUEST:

Please provide a copy of each and every correspondence, internal and external, by or with Liberty regarding Liberty replacing its Riverton Unit 10 after that unit went offline on February 8, 2021, including, but not limited to, such correspondence with the Southwest Power Pool Inc. (SPP). In particular, include each and every correspondence of when Liberty become aware of the generator replacement process of section 3.9.1(ii) in Attachment V (Generator Interconnection Procedures (GIP)) of Southwest Power Pool Inc.'s (SPP) Open Access Transmission Tariff (Tariff).

RESPONSE: ATTACHMENTS CONFIDENTIAL PURSUANT TO 20 CSR 4240-2.135(2)(A)3-8

The responsive correspondence, all designated confidential pursuant to 20 CSR 4240-2.135(2)(A)3-8, will be made available via the Company's designated ShareFile site. Please note, however, that Liberty was never unaware of Section 3.9.1(ii) in Attachment V of the Southwest Power Pool ("SPP") Open Access Transmission Tariff ("OATT"). As voting members of the Transmission Working Group, the Regional Tariff Working Group, and the Market Operations Policy Committee, Liberty supported Revision Request 393 *Generator Replacement Process* through the working group process as detailed below:

Working Group	Revision Request	Voting Attendee	Date	Liberty Vote	Vote Results
Regional Tariff Working Group	393	Todd Tarter	12/19/2019	Support	Passed
Transmission Working Group	393	Nate Morris	12/18/2019	Support	Passed
Market Operations Policy Committee	393	Aaron Doll	1/14/2020	Support	Passed



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Case No. EA-2023-0131

Office Public Counsel Data Request - 0013

Data Request Received: 2023-12-14

Response Date: 2023-12-27

Request No. 0013

Witness/Respondent: Aaron Doll

Submitted by: Nathan Williams, Nathan.Williams@opc.mo.gov

REQUEST:

In Liberty's response to Public Counsel's data request no. 8 it states:

Liberty has been aware of Section 3.9.1(ii) in Attachment V of the Southwest Power Pool ("SPP") Open Access Transmission Tariff ("OATT") since its inception. As voting members of the Transmission Working Group ("TWG"), the Regional Tariff Working Group ("RTWG"), and the Market Operations Policy Committee ("MOPC"), Liberty supported Revision Request ("RR") 393 Generator Replacement Process through the working group process as detailed below:

Working Group	Revision Request	Voting Attendee	Date	Liberty Vote	Votes Results
Regional Tariff Working Group	393	Todd Tarter	12/19/2019	Support	Passed
Transmission Working Group	393	Nate Morris	12/18/2019	Support	Passed
Market Operations Policy Committee	393	Aaron Doll	1/14/2020	Support	Passed

Why did not Liberty not notify SPP of its intention to replace its then black start designated December 1988 vintage 16.3 MW simple cycle natural gas Riverton Unit 10 within one year after that unit went offline on February 8, 2021, due to fire in the insulation around the turbine exhaust bearing of that unit?

RESPONSE:

The replacement determination regarding Riverton 10 was reached subsequent to the expiration of the one-year timeframe. The Company's Integrated Resource Plan ("IRP") was in flight during this period and no definite conclusion had been made until after the one-year timeframe had expired.