

Environmental Matters

We are subject to various federal, state, and local laws and regulations with respect to air and water quality and with respect to hazardous and toxic materials and hazardous and other wastes, including their identification, transportation, disposal, record-keeping and reporting, as well as remediation of contaminated sites and other environmental matters. We are also subject to requirements regulating the operation of renewable energy – hydro, solar and wind. While we are not in a position to accurately estimate compliance costs for any new requirements, we expect these costs to be material, although recoverable in rates.

Compliance Plan

The Company completes an IRP for the generation capacity build-out and replacement plans. Within this IRP, the Company selects a preferred plan that maintains compliance with the current environmental rules. The preferred IRP also balances customers' growing demand and interest in renewable energy, improved environmental performance, and distributed energy resources. Compliance costs we have incurred in previous plans associated with MATS, CSAPR and Missouri Renewable Energy Standard regulation are being recovered in our rates, and we anticipate any future costs to continue to be recoverable in our rates.

The following list summarizes the most significant environmental regulations affecting our operations:

Regulations
Air Emissions - NOx and SO2
ACID RAIN
CAIR (Clean Air Interstate Rule)
CSAPR (Cross State Air Pollution Rule)
MATS (Mercury Air Toxic Standards)
NAAQS (National Ambient Air Quality Standards)
Greenhouse Gases (GHGs) – CO ₂
ACE (Affordable Clean Energy)
Coal Combustion Residuals Rules
Water Discharges
Renewable Energy Standard

EO-2023-0087 DR 0046

Annual Allowance Allocations

Asbury	2022	2023	2024
ARP SO2	6986	6986	6986
CSAPR SO2	4650	4650	4480
CSAPR Nox Annual	934	934	884
CSAPR Nox Ozone Season	310	310	296

Energy Center	2022	2023	2024
ARP SO2	0	0	0
CSAPR SO2	4	4	4
CSAPR Nox Annual	53	53	49
CSAPR Nox Ozone Season	28	28	28

*Iatan	2022	2023	2024
ARP SO2	1949	1949	1949
CSAPR SO2	165	165	36
CSAPR Nox Annual	519	519	371
CSAPR Nox Ozone Season	209	209	199

**Plum Point	2022	2023	2024
ARP SO2	0	0	0
CSAPR SO2	n/a	n/a	n/a
CSAPR Nox Annual	n/a	n/a	n/a
CSAPR Nox Ozone Season	52	52	52

Riverton	2022	2023	2024
ARP SO2	2807	2807	2807
CSAPR SO2	1	1	1
CSAPR Nox Annual	35	35	32
CSAPR Nox Ozone Season	32	32	30

State Line	2022	2023	2024
ARP SO2	0	0	0
CSAPR SO2	5	5	5
CSAPR Nox Annual	130	130	124
CSAPR Nox Ozone Season	74	74	71

Source: CAMD annual allocations (search allowance transaction history)

*Totals reflect Empire's 12% ownership share

**Totals reflect Empire's 7.52% ownership share