

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

In The Matter of a Determination of Special )  
Contemporary Resource Planning Issues to be )  
Addressed by The Empire District Electric ) **File No. EO-2022-0057**  
Company in its Next Triennial Compliance Filing )  
Or Next Annual Update Report )

**STAFF SUGGESTIONS FOR SPECIAL CONTEMPORARY  
RESOURCE PLANNING ISSUES**

**COMES NOW**, Staff of the Missouri Public Service Commission, by and through the undersigned counsel, and for its response to the Commission’s August 26, 2021, *Order Opening A File Regarding Special Contemporary Resource Planning Issues And Offering An Opportunity To File Suggestions*, respectfully states:

1. The Empire District Electric Company d/b/a Liberty is to submit to the Commission its next triennial compliance filing on April 1, 2022.<sup>1</sup>
2. The Commission is to issue an order containing a list of special contemporary issues for Liberty to analyze and document in its next triennial compliance filing or next annual update report.<sup>2</sup>
3. The purpose of the special contemporary issues lists is to ensure that evolving regulatory, economic, financial, environmental, energy, technical, or customer issues are adequately addressed by each utility in its electric resource planning.<sup>3</sup>
4. Pursuant to Commission Rule 20 CSR 4240-22.080(4)(A), Staff suggests Liberty address the following special contemporary issues in its April 1, 2022, triennial compliance filing:

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<sup>1</sup> 20 CSR 4240-22.080(1)(B) requires Liberty to submit its triennial compliance filing on April 1 every third year, beginning in 2013.  
<sup>2</sup> 20 CSR 4240-22.080(4).  
<sup>3</sup> *Id.*

- A. The Company shall provide details of its plans to utilize securitization. Details shall include but are not limited to: 1) type of items to be securitized; 2) explanation for need of securitization for each item; 3) how it plans to utilize securitization for each item; 4) estimated costs of securitized items; 5) comparison of ratepayer costs and benefits.
- B. The Company shall provide detailed analysis comparing ratepayer risks and shareholder risks for additional generation resources which are not required to meet federal, state, or RTO requirements. This is consistent with the Commission's *Order Regarding 2020 Integrated Resource Plan* in Case No. EO-2021-0021 for Ameren Missouri.
- C. Given the recent COVID pandemic and the Winter Storm Uri weather event, the Company shall provide details of its plan for handling future emergency events such as these. The details provided shall give a clear plan for maintaining supply-side resource generation and public welfare during emergency events.

**WHEREFORE**, Staff suggests Liberty address in its April 1, 2022, triennial compliance filing the special contemporary issues set forth above.

Respectfully submitted,

**/s/ Casi Aslin**

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**Attorney for the Staff of the  
Missouri Public Service Commission**

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile, or electronically mailed to all parties and/or counsel of record on this 15<sup>th</sup> day of September 2021.

**/s/ Casi Aslin**