

CONFIDENTIAL DESIGNATIONS

The Empire District Electric Company d/b/a Liberty

ER-2024-0261

RE: All confidential testimony (portions of pp. 10, 12-13) and schedules (portions of Direct Schedule SE-1) of Shawn Eck

The information provided is designated “Confidential” in accordance with Commission Rule 20 CSR 4240-2.135(2)(A)7 and 8 due to the nature of the material regarding the safety and security of Liberty’s critical infrastructure and other utility facilities. Schedule SE-1 identifies, by vendor and specific project, the scope and contents of Empire’s cybersecurity and asset security protections. Liberty recognizes the importance of providing transparent and accurate testimony and information in response to regulatory inquiries. We must emphasize the potential risks associated with disclosing the sensitive information included in the testimony that could inadvertently expose critical infrastructure or systems to cybersecurity threats. Public disclosure of this information would allow adversarial parties and bad actors to develop an attack profile, as the bad actor would know (1) the specific vendors Liberty has engaged, (2) the extent of the security protections, and (3) vulnerabilities that Liberty or the vendors may have. Likewise, the level of a company’s investment in cybersecurity is a relevant data point to building an attack profile. The confidential information in Liberty’s testimony refers to and provides a holistic description of the threats that Liberty is seeking to avoid. Cumulatively, the confidential testimony provides a detailed description of Liberty’s cybersecurity efforts and protections, falling squarely within the category of “(r)elating to the security of a company's facilities” in 20 CSR 4240-2.135(2)(A)7 and trade sections under subsection 8. The confidentiality shall be maintained consistent with that Rule and/or Section 386.480 RSMo., as the case may be. This confidential designation is made in recognition of the ongoing responsibility to protect public safety and national security and to ensure the continued reliability of critical infrastructure. Liberty trusts that all relevant parties will respect the need for such safeguards and will work with Liberty to establish the necessary protections to preserve confidentiality through the regulatory process.

CONFIDENTIAL IN ITS ENTIRETY 20 CSR 424-2.135(2)(A)7, 8

| Cybersecurity Program Workstreams/Projects | |
|--|-------------|
| Workstream/Capability | Description |
| Asset Management | |
| | |
| Business Continuity and Disaster Recovery | |
| | |
| Cybersecurity Risk Management | |
| | |
| Data Protection | |
| | |
| | |
| Endpoint Protection | |
| | |
| Governance, Awareness & Training | |
| | |
| | |
| Identity & Access Management | |
| | |
| IT and OT Incident Response | |
| | |
| Network Protection | |
| | |

CONFIDENTIAL IN ITS ENTIRETY 20 CSR 424-2.135(2)(A)7, 8

Cybersecurity Program Workstreams/Projects

Patch and Vulnerability Management

Physical Security

Secure Change

Secure Operations

Security Monitoring

Third Party Cyber Risk Management