



April 1, 2025

***VIA ELECTRONIC FILING***

Ms. Nancy Dippell, Secretary  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

**RE: The Empire District Electric Company d/b/a Liberty ("Liberty-Empire")  
Commission Case No. EO-2024-0280**

Dear Judge Dippell:

Pursuant to Commission Rules 20 CSR 4240-22.010 through 20 CSR 4240-22.080 and the Commission's *Order Granting Variance* issued May 30, 2024, Liberty-Empire hereby submits its 2025 triennial integrated resource plan ("IRP").

This IRP filing contains eight volumes, as listed below, including an executive summary volume, a volume dedicated to the Missouri IRP filing requirements and an Index of Rule Compliance, and six technical volumes. The ordering and subject matter of the IRP volumes closely correspond to the IRP Rule sections. The technical volumes contain the applicable rule reference and the Company's response as appropriate. The responses to Special Contemporary Issues can be found in Volume 6.

- Volume 1: Executive Summary
- Volume 2: Missouri Filing Requirements and an Index of Rule Compliance
- Volume 3: Load Analysis and Load Forecasting (20 CSR 4240-22.030)
- Volume 4: Supply-Side Resource Analysis (20 CSR 4240-22.040)
- Volume 4.5: Transmission and Distribution Analysis (20 CSR 4240-22.045)
- Volume 5: Demand-Side Resource Analysis (20 CSR 4240-22.050)
- Volume 6: Integrated Resource Plan and Risk Analysis (20 CSR 4240-22.060)
- Volume 7: Resource Acquisition Strategy Selection (20 CSR 4240-22.070)

Please see attached for portions of this filing that are designated as Confidential in accordance with Commission Rule 20 CSR 4240-2.135(2) and/or the protective order issued herein.

In accordance with Commission Rule 20 CSR 4240-22.080(2)(A), attached hereto is a document expressing commitment to the approved preferred resource plan and resource acquisition strategy signed by Mr. Tim Wilson, Liberty President, Central Region-Electric.

Please do not hesitate to contact me with any questions or concerns you may have regarding this matter, and please bring this triennial IRP filing to the attention of the Commissioners and the appropriate Commission personnel.

Sincerely,

*Diana Carter*

**THE EMPIRE DISTRICT ELECTRIC COMPANY d/b/a LIBERTY (LIBERTY-EMPIRE)**

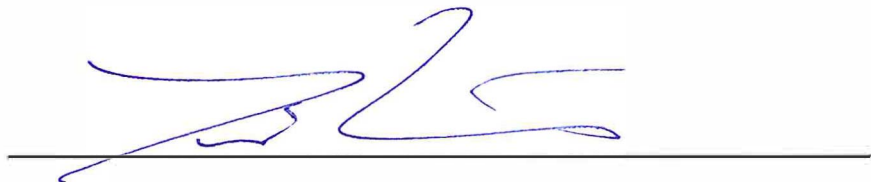
**2025 INTEGRATED RESOURCE PLAN**

**COMMITMENT TO THE  
APPROVED PREFERRED RESOURCE PLAN**

**FILE NO. EO-2024-0280**

In accordance with Missouri Public Service Commission Rule 20 CSR 4240-22, The Empire District Electric Company d/b/a Liberty (Liberty-Empire) developed, described and documented, and now officially adopts for implementation, the preferred resource plan and resource acquisition strategy contained in this filing.

As required, the adopted resource acquisition strategy consists of a preferred resource plan; an implementation plan; and a set of contingency resource plans. I hereby further commit to provide the notice called for by Commission Rule 20 CSR 4240-22, if Liberty-Empire should, between triennial compliance filings, decide to take actions materially inconsistent with the preferred resource plan.



Tim Wilson

President, Central Region-Electric



Dated

## **CONFIDENTIAL DESIGNATIONS**

### **The Empire District Electric Company d/b/a Liberty**

**EO-2024-0280**

#### **RE: All confidential forecasting, analyses, and content of Liberty-Empire's 2025 Integrated Resource Plan**

Certain information contained in Liberty's 2025 Integrated Resource Plan ("IRP"), as specifically listed below, is designated "Confidential" in accordance with Commission Rule 20 CSR 4240-2.135(2)(A). The confidentiality shall be maintained consistent with that Rule and/or Section 386.480 RSMo., as the case may be.

Certain information provided in the IRP is designated "Confidential" in accordance with Commission Rule 20 CSR 4240-2.135(2)(A)1 on the basis that it contains customer-specific information, such as a large customer forecasted as a separate rate class. In efforts to keep the customer's information private, references are designated Confidential.

Certain information provided in the IRP is designated "Confidential" in accordance with Commission Rule 20 CSR 4240-2.135(2)(A)3 due to it containing marketing analysis or other market specific information related to services offered in competition with others, such as outage and maintenance rates for generation units. Public disclosure of outage and maintenance rates could negatively affect Liberty's place in the wholesale electric market, in turn harming Liberty's customers.

Certain information provided in the IRP is designated "Confidential" in accordance with Commission Rule 20 CSR 4240-2.135(2)(A)5, as it contains proprietary or otherwise confidential reports, work papers, or other documentation produced by consultants. As part of the work performed in this IRP, Liberty enlisted the expertise of consultants such as Charles River Associates (CRA), Itron, Applied Energy Group (AEG), and PowerGem (formerly known as Astrape). The work performed by these consultants includes proprietary models that create forecasts for company load and peaks; fuel, market, and emissions prices; financial assumptions; capacity positions; and reliability metrics. As a result, the work and results provided by these consultants is designated Confidential.

Certain information provided in the IRP is designated "Confidential" in accordance with Commission Rule 20 CSR 4240-2.135(2)(A)6, strategies employed, to be employed, or under consideration in contract negotiations, such as matters under consideration regarding Liberty's minority ownership share in and long-term PPA with Plum Point. The analysis performed of potential future changes at the facility could impact future contract negotiations, which, in turn, could negatively affect Liberty's ability to provide the most economical services to customers.

Certain information provided in the IRP is designated “Confidential” in accordance with Commission Rule 20 CSR 4240-2.135(2)(A)7, relating to the security of a company’s facilities. To maintain the safety and security of Liberty’s utility infrastructure and to allow Liberty to continue providing safe and reliable service, this important security and safety information related to Liberty’s critical infrastructure and other utility facilities must not be publicly disclosed.

Provided below is the location, page number, and brief summary (where possible) of all information marked confidential in Liberty’s IRP. Appendices page numbers are identified with “A” and workpapers as “WP.”

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**20 CSR 4240-2.135(2)(A)5** – Reports, work papers, or other documentation related to work produced by internal or external auditors, consultants, or attorneys, except that total amounts billed by each external auditor, consultant, or attorney for services related to general rate proceedings shall always be public.

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| 4 | 41       | by installing at least ** of firm distributed capacity                                       |
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| 4.5 | 28  | and ** per year in fixed O&M costs   |
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| 6 | WP  | Volume 6_Load and Capability Balance_Confidential  |
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| 7 | WP  | Volume 7_PREFERRED Plan_Workpapers_Confidential  |

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| 1      | 9           | to be replaced by new, highly reliable, dual-fuel ** gas turbine resources. |
| 1      | 9           | Footnote [1] **   |
| 1      | 10          | due to their ability to **  |
| 1      | 10          | and operating characteristics of thermal generation **                      |
| 1      | 10          | new dual-fuel ** industrial gas turbines,                                   |
| 1      | 26          | To preserve the units' dual-fuel ** capability,                             |
| 1      | 26          | dual-fuel **capable industrial gas combustion turbines                      |
| 4      | 15 - 16     | **  |
| 4      | 16          | Footnote[1] **  |
| 4      | 16          | gas combustion turbines with dual-fuel ** capability                        |
| 6      | 24          | To preserve the units' dual-fuel ** capability,                             |
| 6      | 24          | dual-fuel ** capable industrial gas combustion turbines                     |
| 6      | 24          | Footnote [1] **   |
| 7      | 18          | Riverton 10 and 11 replaced directly at the site by dual-fuel **            |
| 7      | 25          | with significantly more reliable dual-fuel **                               |
| 7      | 47          | **  |