

In the Matter of the 2024 RES Compliance)
Report and 2025 RES Compliance Plan of The) Case No. _____
Empire District Electric Company d/b/a Liberty)

attached to Liberty's RES Report and Plan is subject to contractual agreements providing for the material to not be disclosed except under certain limited circumstances, and Liberty is contractually obligated to treat this material as "highly confidential," as the material could provide an unjust competitive advantage to certain entities and individuals who decide to participate in Liberty's RES docket.

5. Given the foregoing, Liberty requests a protective order pursuant to Commission Rule 20 CSR 4240-2.135(4), as detailed below:

a. Certain materials and information regarding REC prices and payment terms divulged by Liberty or others in this proceeding shall be considered to be "Highly Confidential" if so designated at the time of disclosure.

b. With regard to entities and individuals other than the Staff of the Commission, the Office of the Public Counsel, and the Missouri Division of Energy, disclosure of materials or information so designated shall be made only to attorneys of record and/or to such outside consultants who have executed and filed a standard Commission Nondisclosure Agreement.

c. Persons afforded access to materials or information designated "Highly Confidential" shall neither use nor disclose such materials or information for purposes of business or competition or any other purpose other than in regard to the case referenced above and shall keep the materials and information secure and confidential and in accordance with the purposes and intent of the protective order.

d. All material and information designated as "Highly Confidential" in the possession of any entity or person, as well as any notes pertaining to such information, shall be returned to Liberty or destroyed upon the conclusion of the referenced case.

e. If a party disagrees with the “Highly Confidential” designation of any information, the party shall follow the informal discovery dispute resolution procedures set forth in Commission Rule 20 CSR 4240-2.090(8). If the party exhausts these dispute resolution procedures, the party may file a motion challenging the designation.

6. The ability to designate information as Highly Confidential in this case, pursuant to a protective order, will ensure that the information is not accidentally used or divulged in another proceeding without the proper Highly Confidential designation required by the contractual agreements referenced above.

WHEREFORE, Liberty requests an order of the Commission, pursuant to Commission Rule 20 CSR 4240-2.135(4), granting a protective order as set forth above. Liberty requests such other and further relief as is just and proper under the circumstances.

Respectfully submitted,

/s/ Diana C. Carter

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CERTIFICATE OF SERVICE

I hereby certify that the above document was filed in EFIS on this 15th day of April, 2025, with a copy sent by electronic mail to the Staff of the Commission and the Office of the Public Counsel.

/s/ Diana C. Carter