

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

In the Matter of the Request of The Empire)	
District Electric Company d/b/a Liberty for)	
Authority to File Tariffs Increasing Rates for)	Case No. ER-2021-0312
Electric Service Provided to Customers in its)	
Missouri Service Area)	

NOTICE OF NEW CHARGE TYPES

COMES NOW The Empire District Electric Company d/b/a Liberty (“Liberty” or the “Company”), and for its notice that the Southwest Power Pool (“SPP”) implemented new charge types, as that phrase is defined in the Company’s Rider FAC, states as follows:

1. The Company’s Rider FAC and, specifically, Tariff Sheet Nos. 17 to 17q (part of Mo. P.S.C. Schedule No. 6 on file with the Commission), provides a process by which the Company is to notify the Commission of new charge types that may be instituted by a regional transmission operator (“RTO”) that operates a centrally administered market. Charge types represent specific credits and charges authorized by the RTO’s tariff and are utilized in the settlements of the utility’s RTO market activity. The charge types in place at the time the Company’s current Rider FAC was approved are on file in this case docket.

2. Before costs or revenues under a new charge type (not previously on file or for a notice that has not previously been given) can be included in a Fuel Adjustment Rate (“FAR”) filing, the Company is required to provide notice, as it is doing here.

3. The notice is required to “identify the proposed accounts affected by such change [i.e., the new charge type], provide a description of the new charge type demonstrating that it possesses the characteristics of, and is of the nature of, the costs or revenues listed in factors PP or OSSR as the case may be, and identify the preexisting market settlement charge types(s) which the new charge type replaces or supplements.” Sheet No. 17c (Item B).

4. The information required is provided in detail on Exhibit A attached hereto and incorporated herein by this reference.

5. As indicated and explained in detail in Exhibit A, SPP implemented six new charge types called “URD” (Uninstructed Resource Deviation), “URD Distribution,” “Day-Ahead Self-Incremental Energy Make-Whole Payment Amount,” “Real-Time Incremental Energy Make-Whole Payment Amount,” “Reliability Unit Commitment Self-Incremental Energy Make-Whole Payment Amount,” and “Local Reliability Distribution Amount Charge Type.” All of these new charge types provide revenues and costs that will be included in the FAC. These charge types will be utilized by SPP to supplement the existing Regulation and Ancillary Services products.

6. The revenues and costs arising under these new charge types began appearing on SPP settlement statements starting with market activity occurring during the month of October 2024. The FAR filing for that accumulation period, however, excluded these new charge types.

7. The new charge types will first be reflected in the next FAR filing – to made in October 2025. Under Rider FAC, a notice such as this must be filed no less than 60 days before sums arising under a new charge type are included in a FAR filing.

8. Unless timely challenged per the terms of Rider FAC, the Commission need take no action in response to this Notice of New Charge Types.

WHEREFORE, Liberty hereby timely submits notice of the new charge types described in detail on Exhibit A hereto, as required by its Rider FAC.

Respectfully submitted,

/s/ Diana C. Carter

Diana C. Carter MBE #50527

The Empire District Electric Company d/b/a Liberty

428 E. Capitol Ave., Suite 303

Jefferson City, Missouri 65101

Joplin Office Phone: (417) 626-5976

Cell Phone: (573) 289-1961
E-Mail: Diana.Carter@LibertyUtilities.com

CERTIFICATE OF SERVICE

I hereby certify that the above document was filed in EFIS on this 1st day of May, 2025,
and sent by electronic transmission to all counsel of record.

/s/ Diana C. Carter

May 1, 2025

Energy Department
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

RE: New Southwest Power Pool Charge Type Notification Monthly FAC Reports –
Supplement – ER-2021-0312

On behalf of The Empire District Electric Company d/b/a Liberty, I am providing to the Missouri Public Service Commission Staff for filling in electronic form certain information pursuant to the Commission approved Stipulation and Agreement reached by the parties in Docket ER-2021-0097 and ER-2021-0098.

SPP RR 578

- “URD Charge”
- Two new charge types
 - URD
 - URD Distribution
- FAC Accounting Changes
 - DA will settle at either 555880 or 447850 depending on whether the settlement location is load or a generator, respectively.
 - RT will settle at either 555980 or 447850 depending on whether the settlement location is load or a generator, respectively.
- Inclusion
 - SPP utilizes Uninstructed Resource Deviation (URD) charges to promote reliability by assessing deterrence charges on generators for noncompliance with dispatch instructions. Prior to RR578 there charges were an offset to Reliability Unit Commit (RUC) Make Whole Payments. This was deemed an inadequate deterrence and SPP has created a new calculation in the tariff and protocols to better deter URD violations and implemented a two new charge types, one to assess the charge and one to distribute the revenue. These new charge types are consistent with the practice of FAC recovery for URD charges and supplements the current MWP charge types by adding two new charge types; therefore, these new charge types should be included in the FAC.

SPP RR 595

- “Incremental & Self-Incremental Make-Whole-Payments”
- Three new charge types
 - Day-Ahead Self-Incremental Energy Make-Whole Payment Amount
 - Real-Time Incremental Energy Make-Whole Payment Amount
 - Reliability Unit Commitment Self-Incremental Energy Make-Whole Payment Amount
- FAC Accounting Changes
 - DA will settle at either 555880 or 447850 depending on whether the settlement location is load or a generator, respectively.
 - RT will settle at either 555980 or 447850 depending on whether the settlement location is load or a generator, respectively.
- Inclusion

- FERC Order 831 revised existing regulations on incremental energy offer caps. The ruling required regional transmission organizations and independent system operators to both cap each resource's incremental energy offer at the higher of \$1,000/megawatt-hour (MWh) or that resource's verified cost-based incremental energy offer; and (2) cap verified cost-based incremental energy offers at \$2,000/MWh when calculating locational marginal prices (LMP). SPP's RR 595 is designed to close a market design gap related to the implementation of FERC Order No. 831 that results in Resources not recovering the cost of incremental dispatch in some scenarios. Incremental & Self-Incremental Make-Whole-Payments will allow make whole payments for instructed Real-Time incremental Energy costs for Day-Ahead Market committed and self-committed Resources. These new charge types are consistent with the practice of FAC recovery for MWP charge types and supplements the current MWP charge types by adding two new charge types; therefore, these new charge types should be included in the FAC.

SPP RR 613

- "Local Reliability Settlement Automation"
- One new charge type
 - Local Reliability Distribution Amount Charge Type (Settlement Area)
- FAC Accounting Changes
 - DA will settle at either 555880 or 447850 depending on whether the settlement location is load or a generator, respectively.
 - RT will settle at either 555980 or 447850 depending on whether the settlement location is load or a generator, respectively.
- Inclusion
 - Previously, SPP has used manual processes to settle make whole payments and collections/distributions that are associated with Local Reliability events, including OOMEs, de-commits and transition cancellations. This process is performed outside normal, automated settlement activities and is run monthly for all ODs within the month as of the last S120 posting to ensure the use of the final set of Billable Metered Load data in the process but requires the daily exchange of spreadsheets between Settlements and Functional Coordination staff to collect and verify occurrences of Local Reliability events. RR 613 will create new settlement charge types that will automate the re-distribution of MWPs to the impacted Settlement Area, via Load Ratio Share, when an event is determined to be a local event. This new charge type is consistent with the practice of FAC recovery for MWP charge types and has been created for efficiency and transparency; therefore the new charge type should be included in the FAC as it simply captures charges that were otherwise included in other existing charge types (Day-Ahead Make-Whole Payment & Make-Whole Payment Distribution Charge Type (System-Wide), RUC Make-Whole Payment & Make-Whole Payment Distribution Charge Type (System-Wide), Real-Time Out-of-Merit Amount, Revenue Neutrality Uplift Distribution Amount, Real-Time Combined Interest Resource Adjustment Amount).

Sincerely,

Charlotte T. Emery

Cc: Office of Public Counsel