



The Empire District Electric Company

A Liberty Utilities Company

Case No. ER-2019-0374

OPC Data Request – 1012

Data Request Received: 03/09/20

Request No. 1012

Submitted by: Robert Schallenberg

Date of Response: 3/24/2020

Respondent: Mark Timpe

REQUEST:

Did Empire ever issue long term promissory notes to support its long-lived assets before Algonquin Power & Utilities Corp. acquired Empire? If so, please provide copies of the promissory notes that Empire issued.

OBJECTION:

Liberty-Empire objects to this DR on the bases that it is overly broad and unlimited in time and seeks information that is not relevant or reasonably calculated to lead to the discovery of admissible evidence in this proceeding.

Subject to and without waiving this objection, Liberty-Empire will provide a timely response to this DR.

RESPONSE:

Yes. Empire has a 1999 Senior Notes Indenture under which \$102 million of unsecured notes have been issued.