

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

In the Matter of the 2024 RES Compliance)
Report and 2025 RES Compliance Plan of The) **File No. EO-2025-0287**
Empire District Electric Company d/b/a Liberty)

STAFF'S REPORT

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"),
by and through counsel, and for its Staff Report, states as follows:

1. On April 15, 2025, The Empire District Electric Company d/b/a Liberty ("Liberty") filed its Renewable Energy Standard (RES) 2024 RES Compliance Report ("Report") and its Compliance Plan ("Plan") for calendar years 2025 through 2027 as required by Commission rule 20 CSR 4240-20.100(8).

2. On May 30, 2025, Staff requested that the Commission granted Staff an extension to file its report for good cause shown. Commission rule 20 CSR 4240-20.100(8)(D) requires Staff to review Liberty's Compliance Plan and Compliance Report and file a Staff report within 45 days of their filing. The Commission granted Staff's request on June 2, 2025, establishing a new deadline of June 6, 2025.

The Report

3. Commission rule 20 CSR 4240-20.100(8)(A)1.A. through P. provide the minimum filing requirements for the RES Compliance Report.

4. As discussed in greater detail in *Staff's Memorandum*, attached and incorporated herein as Attachment A, Staff has not identified any deficiencies in the Report. Liberty has retired sufficient renewable energy credits ("RECs") to satisfy the 2024 RES requirements. However, Liberty retired 60,788.5 RECs above the

RES requirement for 2024. It is Staff's understanding that this was due to human error. Staff further notes that the over-retirement of RECs means there are less RECs to carry-forward or sell at a later date. Liberty sells RECs and passes the benefit to customers through the FAC. Staff further notes that Liberty could request a variance from 20 CSR 4240-20.100(3)(J) which states in part "The RECs shall be retired during the calendar year for which compliance is sought." This would allow Liberty to re-designate the RECs to the 2025 compliance year.

WHEREFORE, Staff tenders its Staff Report on Liberty's 2024 Compliance Report.

Respectfully submitted,

/s/ Eric Vandergriff

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or electronically mailed to all parties and/or counsel of record on this 6th day of June 2025.

/s/ Eric Vandergriff