



June 13, 2025

Missouri Public Service Commission  
200 Madison Street  
Suite 100  
Jefferson City, MO 65102

Re: EA-2023-0131 Order Compliance

To comply with the Commission Order effective June 15, 2024 in Docket Number EA-2023-0131 (Certificate of Convenience and Necessity ("CCN") to Enhance System Resiliency, specially related to its Riverton project) the Company is providing an update on the following settlement terms.

***4.a Company Requirement: Liberty shall finalize necessary agreements with the Kansas Department of Health and Environment to not only tune both replacement units on all available operational fuels at the expected temperature extremes but also be able to operationally test both replacement units on multiple fuel types as needed to maintain operational effectiveness. Liberty shall provide Staff annual reports until necessary agreements are in place. These annual reports shall be submitted through EFIS as non-case filings, with reference to this docket.***

***4.a Company Response:***

*Please see document labeled: "0210002 CSP03200 Construction Permit 11.13.2024", specifically refer to highlighted sentence on page 3.*

***4.b Liberty shall provide Staff annual reports for a period of three years, from the effective date of the CCN, on the weatherization actions that have been taken and the anticipated effects of those actions. These shall be submitted through EFIS as non-case filings, with reference to this docket.***

***4.b. Company Response:***

*Due to the effects of winter storms Uri and Elliott, FERC directed NERC to overhaul and strengthen their winterization requirements. The latest iteration of this is NERC standard EOP-12-2 (the details of which can be found on the NERC website). The Riverton Plant fully complies with NERC EOP-12-2 for all generating units. To ensure compliance with this standard, Liberty developed the Empire Corporate Generator Winterization Policy (See document titled: "Generator Winterization Policy EOP-012-dRevD FINAL 09262024") as well as site specific plant plans, including the Riverton Extreme Cold Weather Plan (See document titled: "Riverton – Extreme Cold Weather Plan Rev C 20241217 1"). Both of these documents outline the actions taken each year at the Riverton Plant to ensure winter preparedness. Also attached are the*



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*Preventative Maintenance Work Orders (PMs), detailing the actions that were completed in October, 2024 in preparation for the winter 2024/2025 season (See Documents titled: [“Order 100000280354”](#), [“Order 100000280355”](#), [“Order 100000280356”](#), [“Order 100000280357”](#), [“Order 100000280358”](#), [“PM and Work Order List”](#), [“Order 100000180136”](#), [“Order 100000280132”](#), [“Order 100000280133”](#), [“Order 100000280134”](#), [“Order 100000280135”](#), [“Order 100000280136”](#), [“Order 100000280137”](#), [“Order 100000280348”](#) and [“Order 100000280352”](#)).*

**4.c** *Liberty shall provide Staff annual reports for a period of three years, from the effective date of the CCN, on agreements/negotiations that occur with natural gas and fuel oil suppliers to ensure that the gas supply to the restoration unit is prioritized appropriately. These shall be submitted through EFIS as non-case filings, with reference to this docket.*

**4.c Company Response:**

**Natural Gas Supply**

In early 2024, Liberty submitted a bid during a non-binding open season to acquire additional firm capacity to serve the Riverton Generating Station in support of the Riverton project. However, the bid was not successful, primarily due to the relatively small volume of capacity requested.

In May 2025, Liberty requested that Southern Star Central (“SSC”) perform a Gate Zero Study to evaluate the availability of firm capacity at multiple locations along its pipeline system, including the Riverton Generating Station. While this study is primarily intended to support the potential siting of new natural gas generation facilities consistent with the Company’s recently filed Integrated Resource Plan (“IRP”) (EO-2024-0280), any firm capacity identified at Riverton will also be evaluated for use by the proposed restoration unit.

**Fuel Oil Supply**

The Company intends to utilize the existing backup fuel oil tank currently serving Riverton Units 10 and 11 to support the new generation units. Since Units 10 and 11 have not yet been formally retired, the Company is developing a transition plan that includes replacing the aging diesel backup fuel with Jet-A, as specified for the new units.

To ensure continuous dual-fuel capability during this transition, temporary frack tanks may be deployed, as necessary, to provide interim fuel storage during inspection and cleaning of the existing tank and will allow for a seamless refill with Jet-A. This approach is intended to minimize, or fully avoid, any interruption to backup fuel availability as the Riverton generation fleet is upgraded.

As project scheduling and planning progresses, the Company will provide Staff with additional details regarding finalized contracts for backup fuel supply and any associated timing considerations.



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Please let the Company know if we can provide any additional details or if there are questions/comments regarding our update.

Sincerely,

*s/ Charlotte Emery*  
Senior Director, Rates & Regulatory Affairs

Cc: Office of the Public Counsel