

**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 ) Case No. ER-2024-0261  
For Electric Service Provided to Customers )  
In its Missouri Service Area )

**PUBLIC COUNSEL’S RESPONSES TO  
LIBERTY’S FIRST SET OF DATA REQUESTS**

**Data Request 1:** Please explain what is meant by “transmission tie-in” as referenced on page 9 of the Direct Testimony of Jordan Seaver filed herein?

***Data Request 1 Response:** By “transmission tie-in” I simply mean the points at which generation connects to the transmission system at a substation. This is called by some “generation interconnect”, or “gen-tie” for short.*

**Data Request 2:** As referenced in Jordan Seaver’s Direct Testimony filed herein, please provide the proposed facility name and/or CCN docket number for the Evergy natural gas unit that is planned to use “transmission tie-in” at the Asbury location?

***Data Request 2 Response:** What I was attempting to refer to is a 100 MW<sub>AC</sub> solar facility named Foxtrot, and details about this facility can be found in Case No. EA-2024-0292. I inadvertently wrote that the facility that has a transmission tie-in at the Asbury substation is a gas facility. I will be correcting any references to this plant in my direct testimony.*

**Data Request 3:** (a) Please provide any and all source documents for this statement on page 6 of Jordan Seaver’s Direct Testimony: “But, the reason that SPP has changed its resource accreditation is that the goal of net-zero carbon emissions, achieved by replacing thermal generation with wind and solar generation, is the direct cause of the resource accreditation changes at SPP.” (b) Please provide a list of all meetings/presentations/summits that you have attended regarding the resource adequacy construct revisions at SPP within the last two years. (c) Please provide a list of all papers/presentations/articles that you have reviewed regarding the resource adequacy construct revisions at SPP within the last two years.