

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

In the Matter of a Determination of Special)
Contemporary Resource Planning Issues to be)
Addressed by The Empire District Electric)
Company d/b/a Liberty in its Next Triennial)
Compliance Filing or Next Annual Update Report)

Case No. EO-2026-0038

**STAFF SUGGESTIONS FOR SPECIAL CONTEMPORARY
RESOURCE PLANNING ISSUES**

COMES NOW, Staff of the Missouri Public Service Commission, by and through the undersigned counsel, and for its response to the Commission’s August 8, 2025, *Order Opening A File Regarding Special Contemporary Resource Planning Issues And Offering An Opportunity To File Suggestions*, respectfully states:

Pursuant to commission Rule 20 CSR 4240-22.080(4)(A), Staff Suggests The Empire District Electric Company d/b/a Liberty (“Liberty”) address the following special contemporary issues¹ in its next annual update report:²

1. Discrete timeline for permitting processes and construction activities of a nuclear power plant:
 - a. At an existing site;
 - i. Include discussion on transmission capacity needs
 - b. At a greenfield site;
 - c. Tax credit availability and likelihood of being able to achieve current milestones;and

¹ The purpose of the special contemporary issues lists is to ensure that evolving regulatory, economic, financial, environmental, energy, technical, or customer issues are adequately addressed by each utility in its electric resource planning. Each special contemporary issues list will identify new and evolving issues but may also include other issues such as unresolved deficiencies or concerns from the preceding triennial compliance filing. 20 CSR 4240-22.080(4).

² Liberty will file its next annual update report on, or around, April 1, 2026.

- d. Discussion on systems that track nuclear-based energy attribute certificates/credits and discussion on State policies (renewable or clean energy standards) that include nuclear-based energy attributes.
2. Large load customers:
- a. Current pipeline of large load customers and which are likely to materialize;
 - b. Discussion on interconnection;
 - c. Potential impact if load does not persist for more than 5, 10, 15 years;
 - d. Ratepayer impact, by class, if current Company cost allocation is utilized; and
 - e. Risk analysis;
 - i. Ratepayer
 - ii. Shareholder
 - iii. Fuel Adjustment Clause (“FAC”) impacts
 - iv. Cost of Renewable Energy Standard (“RES”) compliance
 - v. Changes in load profile or magnitude
3. Capacity:
- a. Updated capacity purchase options;
 - i. Amount
 - ii. Price per kW
4. Battery Energy Storage Systems:
- a. Range of costs;
 - b. Operational characteristics; and
 - c. Useful life

5. Transmission:

- a. Zonal transmission import/export limitations; and
- b. Company/Zonal resource adequacy requirements by season

WHEREFORE, Staff suggests Liberty address in its next annual update report the special contemporary issues set forth above.

Respectfully Submitted,

/s/ Tracy D. Johnson

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronically mailed to all parties and/or counsel of record on this 11th day of September, 2025.

/s/ Tracy D. Johnson