

**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 for | ) | Case No. ER-2024-0261 |
| Electric Service Provided to Customers in its  | ) |                       |
| Missouri Service Area                          | ) |                       |

**OBJECTIONS TO OPC DATA REQUESTS 3042-3044**

3042. In response to OPC DR No. 3026, Mr. Dane indicates that APUC’s Board of Directors  
\*\* \_\_\_\_\_ \*\* Please provide underlying  
documentation (e.g. BOD resolutions or delegations) supporting Mr. Dane’ s response. Also,  
please provide the underlying calculations supporting \*\* \_\_\_\_\_  
\_\_\_\_\_ \*\*

OBJECTION: This data request (“DR”) seeks information held by and regarding APUC –  
and not regarding the subject of this docket, The Empire District Electric Company d/b/a Liberty  
(“Liberty” or “Company”). Liberty objects to this DR on the bases that it: is overly broad; seeks  
information that is beyond Liberty’s possession, custody, and control; is not proportional to the  
needs of the case considering the totality of the circumstances; seeks information that is not  
relevant or reasonably calculated to lead to the discovery of admissible evidence in this proceeding,  
including on the basis that Liberty is not a party to or the subject of the documents; and seeks  
highly sensitive commercial information.

3043. In response to OPC DR No. 3027, Mr. Dane indicates that the APUC has not \*\* \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_ \*\*

OBJECTION: This DR seeks information held by and regarding APUC – and not regarding  
the subject of this docket. Liberty objects to this DR on the bases that it: is overly broad; seeks  
information that is beyond Liberty’s possession, custody, and control; is not proportional to the  
needs of the case considering the totality of the circumstances; seeks information that is not

relevant or reasonably calculated to lead to the discovery of admissible evidence in this proceeding, including on the basis that Liberty is not a party to or the subject of the documents and due to the time period stated in the DR; and seeks highly sensitive commercial information.

3044. As it relates to APUC's Board of Director materials for the period January 1, 2019, through November 2022, please provide a copy of any materials that presents APUC's consolidated weighted average cost of capital ("WACC"), Liberty Utilities Co.'s WACC and Algonquin Power Co.'s WACC. Please provide the underlying workpapers supporting the materials.

OBJECTION: This DR seeks information held by and regarding APUC – and not regarding the subject of this docket. Liberty objects to this DR on the bases that it: is vague and overly broad; seeks information that is beyond Liberty's possession, custody, and control; is not proportional to the needs of the case considering the totality of the circumstances; seeks information that is not relevant or reasonably calculated to lead to the discovery of admissible evidence in this proceeding, including on the basis that Liberty is not a party to or the subject of the documents and due to the time period stated in the DR; and seeks highly sensitive commercial information.

/s/ Diana C. Carter

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