

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

In the Matter of the 2025 Triennial Compliance)	
Filing Pursuant to 20 CSR 4240-22 by The)	File No. EO-2024-0280
Empire District Electric Company d/b/a Liberty)	

LIBERTY’S NOTICE OF CHANGE IN PREFERRED PLAN

COMES NOW The Empire District Electric Company (“Liberty-Empire” or “Company”), pursuant to Missouri Public Service Commission (“Commission”) Rule 20 CSR 4240-22.080, and, for its Notice of Change in Preferred Plan, respectfully states as follows:

1. Liberty filed its last triennial Integrated Resource Plan (“IRP”) herein on April 1, 2025. With the 2025 IRP, Liberty-Empire built upon and confirmed the soundness of the direction laid out in its prior Preferred Plan, creating and extending specific commitments as part of a new near-term three-year implementation plan with key improvements based on recent portfolio and market developments. The 2025 IRP incorporated the advancement of thermal gas resources at the utility-scale and distributed-scale, continuation of utility scale renewable deployment, and the adoption of a broad energy efficiency plan as key parts of a reconfigured generation portfolio. As in the previous triennial IRP filing, the 2025 IRP Preferred Plan included the extension of the operating life of Energy Center 1 and 2 units to 2035 with the option to take advantage of surplus existing interconnection at the site after the retirement of these units, and the retirement of the Riverton 10 and 11 units in 2026 to be replaced by new, highly reliable, dual-fuel gas turbine resources.

2. Within the last sixty (60) days, Liberty determined that that the 2025 Preferred Plan is no longer appropriate.

3. Commission Rule 20 CSR 4240-22.080(12) provides that “(i)f, between triennial compliance filings, the utility’s business plan or acquisition strategy becomes materially inconsistent with the preferred resource plan, or if the utility determines that the preferred resource

plan or acquisition strategy is no longer appropriate, either due to the limits identified pursuant to 4 CSR 240-22.070(2) being exceeded or for other reasons, the utility, in writing, shall notify the commission within sixty (60) days of the utility's determination and shall serve notice on all parties to the most recent triennial compliance filing."

4. The rule further provides that the notification "shall include a description of all changes to the preferred plan and acquisition strategy, the impact of each change on the present value of revenue requirement, and all other performance measures specified in the last filing pursuant to 4 CSR 240-22.080 and the rationale for each change."

5. Consistent with Commission Rule 20 CSR 4240-22.080(12), Liberty is hereby notifying the Commission and all parties to Liberty's 2025 triennial IRP docket of its preferred plan determination. Attached hereto as **Appendix A** is a report containing a description of all changes to the Preferred Plan, the impact of each change on the present value of the revenue requirement and all other performance measures specified in the last filing, and the rationale for each change.

6. In summary, the changes in the 2025 Preferred Plan relate to removal of the 175MW utility-scale solar project in the 2028 timeframe, removal of the demand-side programs throughout the planning horizon, an update for the newly extended Elk River purchased power agreement (PPA) until 2030, and the addition of more Distributed Reciprocating Internal Combustion Engine (RICE) units to balance the Company's capacity needs.

WHEREFORE, Liberty provides this Notice of Change in Preferred Plan in accordance with Commission Rule 20 CSR 4240-22.080(12). No action on the part of the Commission is requested at this time.

Respectfully submitted,

/s/ Diana C. Carter
Diana C. Carter MBE #50527
428 E. Capitol Ave., Suite 303
Jefferson City, Missouri 65101
Joplin Office Phone: (417) 626-5976

Cell Phone: (573) 289-1961
E-Mail: Diana.Carter@LibertyUtilities.com

CERTIFICATE OF SERVICE

I hereby certify that the above document was filed in EFIS on this 15th day of October, 2025, with notification of the same being sent to all counsel of record, and further certify that the above document was sent by electronic transmission to the Staff of the Commission and the Office of the Public Counsel.

/s/ Diana C. Carter