CONFIDENTIAL DESIGNATIONS

The Empire District Electric Company d/b/a Liberty

EA-2025-0299

RE: Confidential Portions of Confidential Direct Schedules SR-1 and SR-3 of Shaen T. Rooney

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1898 & CO.
PART OF BURNS McDONNELL

SITE SELECTION STUDY

LIBERTY UTILITIES

SITING STUDY
PROJECT NO. 178566

REVISION 0
September 15, 2025

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1.0 Executive Summary

1898 & Co., a part of Burns & McDonnell Engineering Company, Inc. ("1898 & Co."), conducted a study for Liberty Utilities ("Liberty") to evaluate potential locations for the development of a 250 MW Simple Cycle Gas Turbine ("SCGT") natural gas-fired electric generation facility ("Study"). The Study focused on ten site areas - eight in Kansas and two in Missouri.

1.1 Assumptions

The siting evaluation was initiated after several assumptions were agreed upon by Liberty and 1898 & Co. These assumptions ensure all sites meet basic requirements and include the following:

- Liberty intends to submit 250 MW into the Southwest Power Pool ("SPP") Expedited Resource Adequacy Study ("ERAS") process. The process requires that a generation interconnect request be submitted by October 2, 2025. The Interconnect request requires that the applicant have site control.
- The project is assumed to be one of the following technologies that are being evaluated concurrently by Liberty; five 50 MW aeroderivative SCGTs, five 50 MW industrial SCGTs, one F-class frame SCGT, or twelve 18 MW reciprocating internal combustion engines ("RICE").
- Liberty provided 4 areas of interest to focus the siting effort.
- The primary intent was to identify preferred points of interconnection. Therefore, while individual sites were selected for evaluations purposes, these sites were intended to represent the area. Neighboring sites could be considered for the Project and could score similarly to the reference sites. Sites that were currently for sale were given preferential treatment.
- The Study is a high-level screening for potential sites with the purpose of ranking site areas for the Project. Additional due diligence will need to be conducted for each of the proposed sites prior to purchase.

1.2 Results

1898 & Co. evaluated ten representative sites across Southeastern Kansas and Southwestern Missouri. A map of the representative sites is shown in Figure 1-1. The results of the siting evaluation are presented in Figure 1-2.

Figure 1-1: Liberty Siting Representative Sites**

**

Figure 1-2: Site Evaluation Results

** [redacted] **

1.3 Conclusions

The State Line 1 site is ranked as the preferred site due to its favorable transmission and site development attributes. The site is also favorable from an environmental and permitting perspective. Following State Line 1 is the Riverton 1 site, which is similar to the State Line 1 site in most regards although it has slightly worse natural gas infrastructure and noticeably worse environmental attributes. In third is the **[redacted]** 1 site and the La Russel 1 site; **[redacted]** 1 possesses better natural gas infrastructure at the cost of worse electrical transmission access and the requirement for some site development activities while La Russel 1 requires little site development activities at the cost of environmental concerns. 1898 & Co. recommends proceeding with further development of the State Line 1 site while using Riverton 1, **[redacted]**, and La Russel 1 as potential alternative sites if needed.

1898 & Co. recommends Liberty take the following next steps:

1. Determine the availability and cost of land by engaging a land acquisition agent and/or discussing with the current owners.
    a. Further site due diligence and development activities, including American Land Title Association ("ALTA") / National Society of Professional Surveyors ("NSPS") survey,

Critical Issues Analysis ("CIA") (desktop resource surveys and permit matrix), Phase 1 Environmental Site Assessment, geotechnical survey, will be recommended prior to land acquisition.

2. Continue negotiations with natural gas marketers and gas pipelines to secure fuel supply.
3. Further refine technology selection to support interconnection process and further development activities.

2.0 Introduction

1898 & Co. performed an assessment to evaluate potential candidate site areas for the development of a 250 MW natural gas-fired SCGT facility. The siting effort focused on ten locations in Kansas and Missouri. The project is assumed to be one of the following technologies that are being evaluated concurrently by Liberty; five 50 MW aeroderivative SCGTs, five 50 MW industrial SCGTs, one F-class frame SCGT, or twelve 18 MW RICEs.

2.1 Study Methodology

1898 & Co. conducted the Study to identify suitable site locations that would be capable of supporting the development of a 250 MW CCGT facility and to evaluate and rank the sites identified. The following sections discuss the process used to identify and evaluate sites within the Study.

2.1.1 Site Identification

Candidate sites were selected based on review of the relative distance to electric transmission, natural gas infrastructure, and a review of site development and environmental considerations based on aerial photography using geographic information system ("GIS") software. Once the infrastructure was identified, siting areas were eliminated with obvious development and environmental challenges. This included avoiding federal lands and counties in non-attainment. Liberty provided areas of interest to 1898 & Co. within which 1898 & Co. identified parcels that best supported the siting criteria. A list of criteria agreed upon by 1898 & Co. and Liberty is summarized in Table 2-1.

Table 2-1: Overview of Siting Criteria

Criteria	Overview and Consideration
Electric Transmission	Proximity to transmission lines rated for at least 115 kV
Fuel Supply Delivery	Proximity to Southern Star natural gas infrastructure and pipelines with a diameter of at least 12 inches
Site Development	Overview for ease of facility site development
Environmental	Range of environmental factors which might affect Project success
Permitting	Range of permitting factors which might affect Project success

A map of the selected sites for evaluation is shown in Figure 2-1.

Figure 2-1: Liberty Siting Sites

**  **

The selected candidate site areas encompass Southwestern Kansas and Southeastern Missouri. Maps detailing each site are presented in Appendix A.

2.1.2 Site Evaluation

A quantitative decision matrix was used to rank each candidate site. In total, 21 different criteria were used to evaluate the candidate sites. These criteria were organized into five major categories and allocated weights totaling 100 percent, that reflect their importance to Project success. Within each major category, the criteria were assigned sub-weights indicative of each criterion's relative importance. The composite weight for each criterion was then calculated as an aggregate of all sub-weighted criteria within the major category. The evaluation categories, category weights, criteria, criteria sub-weights, and composite weights are summarized in further in Table 3-1.

The individual scores for each site and criteria were used along with the corresponding weights to calculate a weighted composite score for each site. These composite scores are calculated as the sum of the products of each score and criterion weight. The site characteristics of each site evaluated are further detailed in Appendix B.

3.0 Candidate Site Evaluation

A quantitative decision matrix was used as a tool to aid in ranking the candidate sites, which is presented in Appendix B. The first step in developing the quantitative decision matrix is determining the objectives or criteria to be used to evaluate the candidate sites. The process used to select the site areas was based on consideration of each of the major characteristics required for an acceptable candidate site, such as electric transmission interconnection, natural gas interconnection, environmental constraints, and land availability. Therefore, site areas that have the necessary infrastructure and become candidate sites are assumed to meet minimum site requirements. For this reason, the focus of the candidate site evaluation and the criteria discussed in this section was to assess the relative advantages and disadvantages of each candidate site.

The evaluation criteria used to judge the relative suitability of each candidate site concerning its ability to support a natural gas facility covers several specific attributes. Each of these attributes represents a characteristic that is important in the evaluation of prospective sites and serves to differentiate the candidate sites from one another. These evaluation criteria are not equivalent in their importance to the decision-making process. Therefore, each criterion was also assigned a weight indicative of its relative importance to the decision-making process. Criteria with the highest weight are considered the most critical for site development and ongoing project success. The assignment of weights to the evaluation criteria was based on the collective professional judgment and experience of 1898 & Co. and Liberty team members who participated in this Study.

In total, 21 different criteria were used to evaluate the candidate sites. These criteria were first organized into five major categories, and these categories were allocated weights that totaled 100 percent. For example, the Environmental category was assigned a weight of 20 percent, therefore 20 percent of the overall evaluation scores were based on environmental impacts criteria. Within each major category, the criteria were assigned sub-weights indicative of each criterion's relative importance. The composite weight for each criterion is then calculated as an aggregate of all sub-weighted criteria within a major category. The evaluation categories, category weights, criteria, criteria sub-weights, and composite weights are summarized in Table 3-1. A detailed discussion of each of these criteria, which includes the rationale used to assign the score for each criterion and the resulting score for each of the nine candidate sites is presented below.

Table 3-1: Site Evaluation Criteria

Criterion	Criterion Weight	Composite Weight
Electric Transmission (20%)		
Transmission Interconnection Proximity	50.0%	10.0%
Transmission Interconnect Substation	10.0%	2.0%
Transmission System Upgrade Cost	40.0%	8.0%
Fuel Supply Delivery (20%)		
Fuel Availability	35.0%	7.0%
Natural Gas Lateral Proximity	40.0%	8.0%
Natural Gas Transportation Cost	20.0%	4.0%
Fuel Supply Competition	5.0%	1.0%

Site Development (20%)		
Potential Community Conflict	10.0%	2.0%
Accessibility	10.0%	2.0%
Constructability	10.0%	2.0%
Usable Area	20.0%	4.0%
Land Availability	50.0%	10.0%
Environmental (20%)		
Nearest Receptor	20.0%	4.0%
Wetlands	20.0%	4.0%
Floodplains	20.0%	4.0%
Archeological / Cultural Resource Risk	20.0%	4.0%
Sensitive Species Risk	20.0%	4.0%
Permitting (20%)		
Land Use / Zoning	35.0%	7.0%
Air Permitting	35.0%	7.0%
Class I Areas	15.0%	3.0%
FAA Considerations	15.0%	3.0%

3.1 Electric Transmission

The Electrical Transmission category, which was assigned a total weight of 20 percent, was comprised of three evaluation criteria. These criteria and associated scoring are described in the following paragraphs. Additional information and scoring for each site are presented in the scoring matrix in Appendix B.

3.1.1 Transmission Interconnection Proximity

Sites that are closer to their respective electrical point of interconnection ("POI") can result in lower costs and fewer environmental impacts, therefore each site's proximity to a potential point of interconnection was used to assign scores for the criterion. Sites that are less than one mile from their respective POI received a score of 50. Sites between one and two miles away received a score of 30. Sites greater than two miles away received a score of 10. The approximate distance from each site to the nearest substation and transmission line can be seen in the Site Data tab of the scoring matrix in Appendix B. .

3.1.2 Transmission Interconnect Substation

Sites that are able to interconnect into an existing substation, and there is sufficient space to expand the substation, would result in a lower cost than having to build a new substation. However, it may be more cost effective to build a new substation at a line tap rather than build a lengthy lateral to an existing substation. A desktop review, using aerial photography and relative distance to a POI, was performed to determine if each site had the potential to interconnect at an existing substation or if it would be more cost effective to build a new substation. Sites that have access to an existing substation with available space for expansion received a score of 50. Sites with access to an existing substation with no evident space for expansion received a score of 30. If a new substation is required, the site receives the lowest score of 10.

3.1.3 Transmission System Upgrade Cost

1898 & Co. performed an FCITC injection study to determine if the existing transmission system could accept the additional generation. 1898 & Co. used the analysis to identify specific areas along the transmission

network where upgrades were needed to existing equipment to support the new generation. Estimated costs associated with the identified upgrades are shown in Appendix C. Sites that required transmission system upgrades of less than $15 million received a score of 50. Sites that required transmission system upgrades of greater than $15 million and less than $40 million received a score of 30. Sites that required transmission system upgrades of greater than $40 million received the lowest score of 10.

3.2 Fuel Supply Delivery

The Fuel Supply Delivery category, which was assigned a total weight of 20 percent, was comprised of four evaluation criteria. These criteria and associated scoring are described in the following paragraphs. Additional information and scoring for each site are presented in the scoring matrix in Appendix B.

3.2.1 Fuel Availability

1898 & Co. and Liberty met with Southern Star Central Gas Pipeline Company ("Southern Star") to discuss transport capacity and the ability for Southern Star to supply gas to a new gas-fired generation project in the area. Southern Star informed us that there is currently no transport capacity available in the natural gas pipelines near any of the candidate sites. All sites would require system upgrades and therefore, fuel availability was not scored for this assessment as it would not differentiate sites.

3.2.2 Natural Gas Lateral Proximity

The distance to the nearest pipeline interconnection was used to assign scores for the criterion. Sites that have closer access to a gas interconnection can reduce costs and environmental impacts. Sites less than two miles from a pipeline were given a score of 50. Sites that are between two and seven miles from a pipeline were given a score of 30. Sites that are further than seven miles away were assigned the lowest score of 10. The approximate distance to the nearest natural gas pipeline interconnection is presented in the Site Data tab of the scoring matrix in Appendix B.

3.2.3 Natural Gas Transportation Cost

1898 & Co. was instructed by Liberty that all potential sites would be subject to the maximum tariff rate for natural gas transportation costs; accordingly, each site received a score of 30 for this category. However, the Altoona 1, Altoona 2, and Altoona 3 sites are all closer to a more favorable Southern Star pipeline, resulting in a higher score of 50 for those sites.

3.2.4 Fuel Supply Competition

It would be advantageous for a project to have access to multiple sources. This would reduce the risk associated with natural gas commodity price spikes and allow for supply competition. A site was given a 50 if it has access to multiple gas supply sources within 5 miles. A site was given a 30 if it only has access to multiple gas supply sources within 10 miles. If multiple sources were not available within 10 miles, then the site was given the lowest score of 10.

3.3 Site Development

The Site Development category, which was assigned a total weight of 20 percent, was comprised of five evaluation criteria. These criteria are described in the following paragraphs. Additional information and scoring for each site are presented in the scoring matrix in Appendix B.

3.3.1 Potential Community Conflict

Potential community conflicts or resistance may cause difficulty in the development of a site. While it is difficult to know if a community conflict would be triggered, one indication of the risk of these conflicts is nearby public gathering locations such as churches, schools, parks, hospitals, meeting halls, as well as

suburbs and neighborhoods. Each site was scored based on proximity to these public gathering locations or neighborhoods. Sites over two miles from potential community conflicts received a score of 50. Sites located between one and two miles from potential community conflicts received a score of 30. Sites within a mile of a potential conflict received the lowest score of 10. The approximate distance from the nearest church, school, park, hospital, or residential area is presented in the Site Data tab of the scoring matrix in Appendix B.

3.3.2 Accessibility

To reduce the likelihood of new road construction and facilitate easy access to the site for equipment deliveries, it is beneficial for a potential site to have existing paved roads on or adjacent to the site. Road access was scored based on the nearest roads to the site. Sites that were highly accessible from either entry roads or highways were assigned a score of 50. Sites with moderate accessibility from highways or county roads received a score of 30. Sites that have challenges with accessibility from either entry roads or county roads received a score of 10.

3.3.3 Constructability

The terrain that currently exists at each site would contribute to the various activities required during the construction of the facility. Ideally, the site has minimal elevation changes and natural vegetation to reduce costs associated with clearing and grading during construction. A site with favorable terrain and clearing received a score of 50. A site with moderate terrain and clearing received a score of 30. A site with unfavorable terrain or clearing received the lowest score of 10.

3.3.4 Usable Area

The size of the parcel is important to allow for not only the finished site boundary, but also construction activities. More area allows for additional flexibility when considering property boundary off sets, construction laydown and parking, and overall general arrangement of the Project without encountering spatial constraints. Through a desktop review, the usable area of the site was considered, differing from the total parcel size. The determination of the usable area encompasses considerations for the property suitable for development, removing land with steep gradients, wetlands, and current infrastructure from the total acreage. The desktop review was performed only on the representative site within each siting area. A property size with usable area greater than 40 acres scored a 50, sites with between 40 and 15 acres scored a 30, and sites with less than 15 acres scored a 10.

3.3.5 Land Availability

Since Liberty needs to acquire site control quickly to submit an interconnect request through the ERAS process, land availability (i.e. property already for sale or owned by Liberty) was a primary concern for site development. Sites that were already owned by Liberty or were currently for sale scored a 50. Sites that were currently for sale or lease scored a 30. Sites that were not currently on the market scored a 10.

3.4 Environmental

The Site Environmental category, which was assigned a total weight of 20 percent, was comprised of five evaluation criteria. These criteria are described in the following paragraphs. Additional information and scoring for each site are presented in the scoring matrix in Appendix B.

3.4.1 Nearest Receptor

Several factors can contribute to whether the Project would produce noise, visual, dust, electric fields, or odor impacts to the surrounding area during the construction and operation of the facility. However, while it

is difficult to quantify the impacts, the number of such receptors near a prospective site is one variable that can be measured.

To determine potential impacts created by developing the Project at each site, a desktop review of nearby receptors and inhabited buildings was performed using aerial photography. Receptors that are greater than a mile away from the site received a score of 50. If the nearest receptor was between a quarter mile and one mile away, the site received a score of 30. If the nearest receptor was less than a quarter mile from the site, the site received the lowest score of 10.

3.4.2 Wetlands

Wetlands are a federally regulated resource. Any impacts to wetlands must generally be mitigated by the creation of a like or greater number of wetlands at a nearby location, therefore sites that can avoid wetlands are more favorable. To determine the likelihood of impacting wetlands/streams during the development of a given power plant facility, U.S. Geological Survey (“USGS”) topographic maps, aerial photography, and U.S. Fish and Wildlife Service (“USFWS”) National Wetland Inventory maps were reviewed. The density of wetlands, streams, ponds, and the appearance of low-lying areas were used to determine potential wetland impacts. Sites with the highest potential for avoiding wetland impact received a score of 50. Sites near emergent or seasonal wetlands with a moderate potential for avoidance received a score of 30. Sites near fens or forested wetlands with the lowest potential for avoidance received the lowest score of 10. The identified wetland areas are shown in the site maps in Appendix A.

3.4.3 Floodplains

Federal Emergency Management Agency (“FEMA”) Flood Insurance Rate Maps (“FIRM”) were reviewed to determine floodplain locations relative to potential site locations. The maps were downloaded from readily available Internet resources. In cases where flood data was not available, topographic maps, aerial images, and county flood maps were reviewed in parallel to assist in determining potential floodplain concerns. Sites located outside floodplains received a score of 50. Sites located partially within floodplains but with potential developable area received a score of 30. Sites located largely inside floodplains with limited developable area received the lowest score of 10.

3.4.4 Archeological / Cultural Resource Risk

A desktop review was conducted to determine the likelihood of impacting cultural resources during the development of the facility for each site area. A large part of the desktop review involved reviewing the known cultural sites as listed in the National Register of Historic Places ("NRHP") at the county level. The NRHP list was obtained from the U.S. National Park Survey (“NPS") website and included a listing of properties for each county represented in the siting study. The NRHP does not list the address or complete description of the location of the archaeological site; however, the site name and approximate location are provided in some instances. Additionally, restricted Utah State Historic Preservation Office (“SHPO”) data available only to Utah Registered Professional Archeologists (“RPA”) was also reviewed.

The USGS topographic maps and aerial photography were also examined for type of terrain, proximity to water, river meanders, and vegetative cover. Through experience, these features suggest where archaeological sites are most likely or not likely to be located because they equate to permanent sources of nearby water, high ground near a floodplain, and the headwaters of small streams, rivers, or intermittent streams of the confluence of these waterways. For floodplains of large rivers, visible meanders were examined. If it appeared that a meander had recently occurred (within the last 100 years), it was anticipated that the meander had removed or repositioned cultural remains. Therefore, the potential impact on cultural resources with development was less likely. Sites with the lowest potential for cultural impacts

received a score of 50. Sites with moderate potential for cultural impacts received a score of 30. Sites with the highest potential for cultural impacts received the lowest score of 10.

3.4.5 Sensitive Species Risk

To determine the likelihood of impacting federally listed threatened or endangered ("T&E") species or their designated critical habitat during the development of the proposed gas facility, a high-level analysis was performed to identify T&E species that could occur within the site areas. Potential risks to wildlife resulting from the development of the Project include various impacts on federal- and state-protected species. Regulatory guidance for compliance with the USFWS includes efforts to evaluate the Project risks under the Endangered Species Act ("ESA"), Migratory Bird Treaty Act ("MBTA"), and Bald and Golden Eagle Protection Act ("BGEPA"). USFWS consultation for the Project under the ESA should consider the effects on T&E species and their designated critical habitats.

The USFWS Information, Planning, and Conservation System ("IPaC") online tool was also accessed. The IPaC identified several federally listed T&E species that may be present within the various project areas. The monarch butterfly and western regal fritillary were common to most sites. No critical habitat was identified for any species at any of the sites.

Sites were scored based on the expected potential for impacts to T&E. Sites with a low expectation of impact received a score of 50. Sites with a moderate expectation of impact received a score of 30. Sites with a high expectation of impact received a score of 10.

3.5 Permitting

The Permitting category, which was assigned a total weight of 20 percent, was comprised of four evaluation criteria. These criteria are described in the following paragraphs. Additional information and scoring for each site are presented in the scoring matrix in Appendix B.

3.5.1 Land Use / Zoning

Brownfield sites are preferred to avoid the need to re-zone a site. Thus, sites with industrial zoning received a score of 50. Greenfield sites that required no re-zoning received a score of 40. Sites that are currently being used for farming purposes with agriculture or rural zoning, which will require re-zoning, received a score of 20. Sites with residential, city, or forestry zoning that will require extensive re-zoning received the lowest score of 10.

3.5.2 Air Permitting

The EPA has designated areas that do not meet the National Ambient Air Quality Standards ("NAAQS") as nonattainment. Permitting a new facility in these nonattainment areas is more difficult and can result in more emissions controls equipment and/or costs for a project, depending on the level of emissions. Further, the time to issue the permit would be more in a nonattainment area which may hold up starting construction of the Project, depending on the planned schedule. Therefore, if a site was located in a nonattainment area with major potential for schedule impacts, the site received the lowest score of 10. Sites located in nonattainment or maintenance areas with moderate potential for schedule impacts received a score of 30. Sites that are in attainment areas received a score of 50.

All the selected sites in this Study are located in attainment areas and received a score of 50.

3.5.3 Class I Areas

Permitting near a federally designated Class I area could require additional efforts during permitting and/or add constraints to a project that might not otherwise exist. Permitting near these areas will require

additional modeling for air permitting purposes to demonstrate to the federal land managers that there won't be exceedances of the NAAQS or Prevention of Significant Deterioration ("PSD") increment, and that there won't be visibility impairments. A site farther than 150 kilometers ("km") from Class I areas received a score of 50. Sites between 100 km and 150 km received a score of 30. A site that is located less than 100 km from a Class I area received a score of 10. It should be noted these additional permitting efforts are only required if the proposed project triggers PSD. A SCGT or RICE plant will not likely trigger PSD.

3.5.4 FAA Consideration

Per Part 77 of the Code of Federal Regulations, the Federal Aviation Authority ("FAA") requires persons and organizations to file a notice at least 45 days before the start of construction of a facility that is near a public use or military airport to evaluate the effect of the construction on operating procedures and to identify potentially hazardous effects on air navigation. Once a notice has been filed, the FAA would complete an aeronautical study and decide based on the study's findings. To evaluate the Project's potential impact on navigable airspaces, sites with an FAA facility located within three miles of the Project, the site received the lowest score of 10. Sites with an FAA facility located between three to four miles away received a score of 30. Sites without an FAA facility located four miles away or greater received the highest score of 50. The approximate distance from each site to the nearest airport is presented in Appendix B.

4.0 Candidate Site Description

This section contains narrative descriptions of each site area with an emphasis on characteristics that are important in the subsequent evaluation process. With consideration of future real estate conditions and further analyses, the site boundaries for a specific site could be modified or sites in general proximity could be considered for the Project. Detailed maps of each site are presented in Appendix A. The locations shown on the site maps are considered to be representative of site areas.

4.1 **[redacted]**

[redacted]

Wetlands data from the national wetlands inventory ("NWI") indicated there are two wetlands and one stream present within the potential site for the Project that are likely avoidable. Flood zone data acquired through FEMA showed that floodplains are not present at the site.

**[redacted]* has multiple structures located within a mile radius of the facility. The structures consist of barns, homes, silos, and other farming structures. The closest structure to the site is 0.12 miles from the proposed generation facility location. Additionally, 1898 & Co. identified the closest potential community conflict to the site – a cemetery that is 0.1 miles away.

4.1.1 Current Site Conditions

[redacted]

4.1.2 Natural Gas Interconnection

1898 & Co. evaluated natural gas infrastructure in the region that could support the Project. **[redacted]**

4.1.3 Electric Transmission

1898 & Co. proposes interconnecting to the **[redacted]** Considering the proximity and generally flat terrain, interconnecting at the existing **[redacted]** is a more favorable option in comparison to a new substation on-site.

4.1.4 Environmental and Permitting

Preliminary findings from the wetlands and floodplains evaluation suggest moderate hazards related to unavoidable wetlands and floods. Archeological and Cultural Resource Risk assessments were conducted and show low risk associated with cultural resources. Federal Threatened and Endangered Species Risk was determined to be of low potential impact based on the location of the site.

The land use and zoning review showed that **[redacted]** is currently zoned for agricultural use and would require rezoning to accommodate the Project. **[redacted]** falls within an attainment zone which is favorable for air permitting. FAA considerations did not reveal any concerns for the project site.

4.2 **[redacted]**

[redacted]

Wetlands data from the national wetlands inventory ("NWI") indicated there are no wetlands present at the site. Flood zone data acquired through FEMA showed that floodplains are not present at the site.

[redacted] has multiple structures located within a mile radius of the facility. The structures consist of barns, homes, silos, and other farming structures. The closest structure to the site is 0.02 miles from the proposed generation facility location. Additionally, 1898 & Co. identified the closest potential community conflict to the site – a cemetery that is 0.98 miles away.

4.2.1 Current Site Conditions

[redacted]

4.2.2 Natural Gas Interconnection

1898 & Co. evaluated natural gas infrastructure in the region that could support the project. **[redacted]**

4.2.3 Electric Transmission

1898 & Co. proposes interconnecting to the [redacted] Considering the proximity and generally flat terrain, interconnecting at the existing **[redacted]** is a more favorable option in comparison to a new substation on-site.

4.2.4 Environmental and Permitting

Preliminary findings from the wetlands and floodplains evaluation suggest minimal hazards related to unavoidable wetlands and floods. Archeological and Cultural Resource Risk assessments were conducted and show low risk associated with cultural resources. Federal Threatened and Endangered Species Risk was determined to be of low potential impact based on the location of the site.

The land use and zoning review showed that **[redacted]** is currently zoned for agricultural use and would require rezoning to accommodate the Project. **[redacted]** falls within an attainment zone which is favorable for air permitting. FAA considerations did not reveal any concerns for the project site.

4.3 **[redacted]**

[redacted]

Wetlands data from the national wetlands inventory ("NWI") indicated there are two wetlands present within the potential site for the Project that are likely avoidable. Flood zone data acquired through FEMA showed that floodplains are not present at the site.

[redacted] has multiple structures located within a mile radius of the facility. The structures consist of barns, homes, silos, and other farming structures. The closest structure to the site is 0.07 miles from the proposed generation facility location. Additionally, 1898 & Co. identified the closest potential community conflict to the site – a cemetery that is 1.62 miles away.

4.3.1 Current Site Conditions

[redacted]

4.3.2 Natural Gas Interconnection

1898 & Co. evaluated natural gas infrastructure in the region that could support the project. **[redacted]**

4.3.3 Electric Transmission

1898 & Co. proposes interconnecting to the **[redacted]** Considering the proximity and generally flat terrain, interconnecting at the existing **[redacted]** is a more favorable option in comparison to a new substation on-site.

4.3.4 Environmental and Permitting

Preliminary findings from the wetlands and floodplains evaluation suggest moderate hazards related to unavoidable wetlands and floods. Archeological and Cultural Resource Risk assessments were conducted and show low risk associated with cultural resources. Federal Threatened and Endangered Species Risk was determined to be of low potential impact based on the location of the site.

The land use and zoning review showed that **[redacted]** is currently zoned for residential use and would require rezoning to accommodate the Project. **[redacted]** falls within an attainment zone which is favorable for air permitting. FAA considerations did not reveal any concerns for the project site.

4.4 **[redacted]**

[redacted]

Wetlands data from the national wetlands inventory ("NWI") indicated there are two wetlands present within the potential site for the Project that are likely avoidable. Flood zone data acquired through FEMA showed that floodplains are not present at the site.

[redacted] has multiple structures located within a mile radius of the facility. The structures consist of barns, homes, silos, and other farming structures. The closest structure to the site is 0.07 miles from the proposed generation facility location. There are no nearby potential community conflict structures.

4.4.1 Current Site Conditions

[redacted]

4.4.2 Natural Gas Interconnection

1898 & Co. evaluated natural gas infrastructure in the region that could support the project. **[redacted]**

4.4.3 Electric Transmission

1898 & Co. proposes interconnecting to the **[redacted]** Considering the proximity and generally flat terrain, interconnecting at the existing **[redacted]** is a more favorable option in comparison to a new substation on-site.

4.4.4 Environmental and Permitting

Preliminary findings from the wetlands and floodplains evaluation suggest moderate hazards related to unavoidable wetlands and floods. Archeological and Cultural Resource Risk assessments were conducted and show low risk associated with cultural resources. Federal Threatened and Endangered Species Risk was determined to be of low potential impact based on the location of the site.

The land use and zoning review showed that **[redacted]** is currently zoned for agricultural use and would require rezoning to accommodate the Project. **[redacted]** falls within an attainment zone which is favorable for air permitting. FAA considerations did not reveal any concerns for the project site.

4.5 La Russel 1

La Russel 1 is an 89-acre parcel located near La Russell, Missouri.

Wetlands data from the national wetlands inventory ("NWI") indicated there are nine wetlands present within the potential site for the Project that are likely avoidable. Flood zone data acquired through FEMA showed that a floodplain crosses the northern boundary of the parcel.

La Russel 1 has multiple structures located within a mile radius of the facility. The structures consist of barns, homes, silos, and other farming structures. The closest structure to the site is 0.05 miles from the proposed generation facility location. There are no nearby potential community conflict structures.

4.5.1 Current Site Conditions

La Russel 1 sits on a flat and clear piece of land West of La Russell, Missouri. Access to the site is open, with Gum Rd. on its western border. The site is approximately 2.2 miles from State Highway 37.

4.5.2 Natural Gas Interconnection

1898 & Co. evaluated natural gas infrastructure in the region that could support the project. The nearest gas lateral to La Russel 1 that is at least 12 inches in diameter is the 16-inch Southern Star line 0.08 miles of the site at the La Russel substation.

4.5.3 Electric Transmission

1898 & Co. proposes interconnecting to the La Russel substation, owned by Empire District Electric Company, where three 161 kV transmission lines already exist. The distance from the proposed siting of the project to the transmission line is 0.42 miles. Considering the proximity and generally flat terrain,

interconnecting at the existing La Russel 161 kV substation is a more favorable option in comparison to a new substation on-site.

4.5.4 Environmental and Permitting

Preliminary findings from the wetlands and floodplains evaluation suggest moderate hazards related to unavoidable wetlands and floods. Archeological and Cultural Resource Risk assessments were conducted and show high risk associated with cultural resources. Federal Threatened and Endangered Species Risk was determined to be of moderate potential impact based on the location of the site.

The land use and zoning review showed that La Russel 1 is currently zoned for general industrial use and would not require rezoning to accommodate the Project. La Russel 1 falls within an attainment zone which is favorable for air permitting. FAA considerations did not reveal any concerns for the project site.

4.6 State Line 1

State Line 1 is a 161-acre parcel located near Central City, Missouri.

Wetlands data from the national wetlands inventory ("NWI") indicated there are four wetlands present within the potential site for the Project that are likely avoidable. Flood zone data acquired through FEMA showed that floodplains are not present at the site.

State Line 1 has multiple structures located within a mile radius of the facility. The structures consist of barns, homes, silos, and other farming structures. The closest structure to the site is 0.05 miles from the proposed generation facility location. Additionally, 1898 & Co. identified the closest potential community conflict to the site – a surgical institute that is 0.88 miles away.

4.6.1 Current Site Conditions

State Line 1 sits on a flat and clear piece of land Southwest of Central City, Missouri. Access to the site is open, with State Line Rd. on its western border. The site is approximately 1.18 miles from Southeast Highway 26.

4.6.2 Natural Gas Interconnection

1898 & Co. evaluated natural gas infrastructure in the region that could support the project. The nearest gas lateral to State Line 1 that is at least 12 inches in diameter is the 20-inch Southern Star line that intersects the site. There is an alternate Southern Star pipeline that is 2.25 miles East of the site.

4.6.3 Electric Transmission

1898 & Co. proposes interconnecting to the State Line substation, owned by Empire District Electric Company, where four 161 kV transmission lines already exist. The distance from the proposed siting of the project to the transmission line is zero miles. Considering the proximity and generally flat terrain, interconnecting at the existing State Line 161 kV substation is a more favorable option in comparison to a new substation on-site.

4.6.4 Environmental and Permitting

Preliminary findings from the wetlands and floodplains evaluation suggest moderate hazards related to unavoidable wetlands and floods. Archeological and Cultural Resource Risk assessments were conducted and show low risk associated with cultural resources. Federal Threatened and Endangered Species Risk was determined to be of moderate potential impact based on the location of the site.

The land use and zoning review showed that State Line 1 is currently zoned for general industrial use and would not require rezoning to accommodate the Project. State Line 1 falls within an attainment zone which is favorable for air permitting. FAA considerations did not reveal any concerns for the project site.

4.7 **[redacted]**

[redacted]

Wetlands data from the national wetlands inventory ("NWI") indicated there is one wetland present within the potential site for the Project that are likely avoidable. Flood zone data acquired through FEMA showed that floodplains are not present at the site.

**[redacted]* has multiple structures located within a mile radius of the facility. The structures consist of barns, homes, silos, and other farming structures. The closest structure to the site is 0.04 miles from the proposed generation facility location. There are no nearby potential community conflict structures.

4.7.1 Current Site Conditions

[redacted]

4.7.2 Natural Gas Interconnection

1898 & Co. evaluated natural gas infrastructure in the region that could support the project. **[redacted]**

4.7.3 Electric Transmission

1898 & Co. proposes interconnecting to the **[redacted]* Considering the proximity and generally flat terrain, interconnecting at the existing **[redacted]** is a more favorable option in comparison to a new substation on-site.

4.7.4 Environmental and Permitting

Preliminary findings from the wetlands and floodplains evaluation suggest moderate hazards related to unavoidable wetlands and floods. Archeological and Cultural Resource Risk assessments were conducted and show low risk associated with cultural resources. Federal Threatened and Endangered Species Risk was determined to be of low potential impact based on the location of the site.

The land use and zoning review showed that **[redacted]** is currently zoned for agricultural use and would require rezoning to accommodate the Project. **[redacted]** falls within an attainment zone which is favorable for air permitting. FAA considerations did not reveal any concerns for the project site.

4.8 Altoona 2

[redacted].

Wetlands data from the national wetlands inventory ("NWI") indicated there are two wetlands present within the potential site for the Project that are likely avoidable. Flood zone data acquired through FEMA showed that floodplains are not present at the site.

[redacted] has multiple structures located within a mile radius of the facility. The structures consist of barns, homes, silos, and other farming structures. The closest structure to the site is 0.2 miles from the proposed generation facility location. There are no nearby potential community conflict structures.

4.8.1 Current Site Conditions

[redacted]

4.8.2 Natural Gas Interconnection

1898 & Co. evaluated natural gas infrastructure in the region that could support the project. **[redacted]**

4.8.3 Electric Transmission

1898 & Co. proposes interconnecting to the **[redacted]** Considering the proximity and generally flat terrain, interconnecting at the existing **[redacted]** is a more favorable option in comparison to a new substation on-site.

4.8.4 Environmental and Permitting

Preliminary findings from the wetlands and floodplains evaluation suggest moderate hazards related to unavoidable wetlands and floods. Archeological and Cultural Resource Risk assessments were conducted and show moderate risk associated with cultural resources. Federal Threatened and Endangered Species Risk was determined to be of low potential impact based on the location of the site.

The land use and zoning review showed that **[redacted]** is currently zoned for agricultural use and would require rezoning to accommodate the Project. **[redacted]** falls within an attainment zone which is favorable for air permitting. FAA considerations did not reveal any concerns for the project site.

4.9 **[redacted]**

[redacted]

Wetlands data from the national wetlands inventory ("NWI") indicated there are no wetlands within the potential site for the Project. Flood zone data acquired through FEMA showed that floodplains are not present at the site.

[redacted] has multiple structures located within a mile radius of the facility. The structures consist of barns, homes, silos, and other farming structures. The closest structure to the site is 0.2 miles from the proposed generation facility location. There are no nearby potential community conflict structures.

4.9.1 Current Site Conditions

[redacted]

4.9.2 Natural Gas Interconnection

1898 & Co. evaluated natural gas infrastructure in the region that could support the project. **[redacted]**

4.9.3 Electric Transmission

1898 & Co. proposes interconnecting to the **[redacted]** Considering the proximity and generally flat terrain, interconnecting at the existing **[redacted]** is a more favorable option in comparison to a new substation on-site.

4.9.4 Environmental and Permitting

Preliminary findings from the wetlands and floodplains evaluation suggest minimal hazards related to unavoidable wetlands and floods. Archeological and Cultural Resource Risk assessments were conducted and show low risk associated with cultural resources. Federal Threatened and Endangered Species Risk was determined to be of low potential impact based on the location of the site.

The land use and zoning review showed that **[redacted]** is currently zoned for agricultural use and would require rezoning to accommodate the Project. **[redacted]** falls within an attainment zone which is favorable for air permitting. FAA considerations did not reveal any concerns for the project site.

4.10 Riverton 1

Riverton 1 is a 78-acre parcel located near Riverton, Kansas.

Wetlands data from the national wetlands inventory ("NWI") indicated there is one wetland present within the potential site for the Project that are likely avoidable. Flood zone data acquired through FEMA showed that a floodplain covers the entire parcel.

Riverton 1 has multiple structures located within a mile radius of the facility. The structures consist of barns, homes, silos, and other farming structures. The closest structure to the site is 0.02 miles from the proposed generation facility location. Additionally, 1898 & Co. identified the closest potential community conflict to the site – a park that is 0.66 miles away.

4.10.1 Current Site Conditions

Riverton 1 sits on a flat and wooded piece of land South of Riverton, Kansas. Access to the site is open, with Varck Rd. on its northern border. The site is approximately 0.6 miles from SE Highway Alternate 69.

4.10.2 Natural Gas Interconnection

1898 & Co. evaluated natural gas infrastructure in the region that could support the project. The nearest gas lateral to Riverton 1 that is at least 12 inches in diameter is the 12-inch Southern Star line that is 0.22 miles South of the site. There is an alternate Southern Star pipeline that is 1.15 miles North of the site.

4.10.3 Electric Transmission

1898 & Co. proposes interconnecting to the Riverton substation, owned by Empire District Electric Company, where multiple 161 kV transmission lines already exist. The distance from the proposed siting of the project to the transmission line is 0.45 miles. Considering the proximity and generally flat terrain, interconnecting at the existing Riverton 161 kV substation is a more favorable option in comparison to a new substation on-site.

4.10.4 Environmental and Permitting

Preliminary findings from the wetlands and floodplains evaluation suggest likely hazards related to unavoidable wetlands and floods. Archeological and Cultural Resource Risk assessments were conducted and show low risk associated with cultural resources. Federal Threatened and Endangered Species Risk was determined to be of moderate potential impact based on the location of the site.

The land use and zoning review showed that Riverton 1 is currently zoned for general industrial use and would not require rezoning to accommodate the Project. Riverton 1 falls within an attainment zone which is favorable for air permitting. FAA considerations did not reveal any concerns for the project site.

5.0 Results

The results and conclusion reached from this Study are presented below.

A quantitative decision matrix was used to document the evaluation and rank each candidate site. In total, 25 different criteria were used to evaluate the candidate sites. Figure 5-1 shows the rankings of the site evaluation.

Figure 5-1: Site Evaluation Results

** [redacted] **

The State Line 1 site is ranked as the preferred site due to its favorable transmission and site development attributes. The site is also favorable from an environmental and permitting perspective. Following State Line 1 is the Riverton 1 site, which is similar to the State Line 1 site in most regards although it has slightly worse natural gas infrastructure and noticeably worse environmental attributes. In third is the **[redacted]** site and the La Russel 1 site; **[redacted]** possesses better natural gas infrastructure at the cost of worse electrical transmission access and the requirement for some site development activities while La Russel 1 requires little site development activities at the cost of environmental concerns. 1898 & Co. recommends proceeding with further development of the State Line 1 site while using Riverton 1, **[redacted]**, and La Russel 1 as potential alternative sites if needed.

1898 & Co. recommends Liberty take the following next steps:

1. Determine the availability and cost of land by engaging a land acquisition agent and/or discussing with the current owners.

a. Further site due diligence and development activities, including American Land Title Association ("ALTA") / National Society of Professional Surveyors ("NSPS") survey, Critical Issues Analysis ("CIA") (desktop resource surveys and permit matrix), Phase 1 Environmental Site Assessment, geotechnical survey, will be recommended prior to land acquisition.

2. Continue negotiations with natural gas marketers and gas pipelines to secure fuel supply.
3. Further refine technology selection to support interconnection process and further development activities.

APPENDIX A - LOCATION MAP BOOK

Appendix A is CONFIDENTIAL pursuant to 20 CSR 4240-2.135(2)(A)5

**CONFIDENTIAL PURSUANT TO
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APPENDIX B - SITE SELECTION SCORING MATRIX

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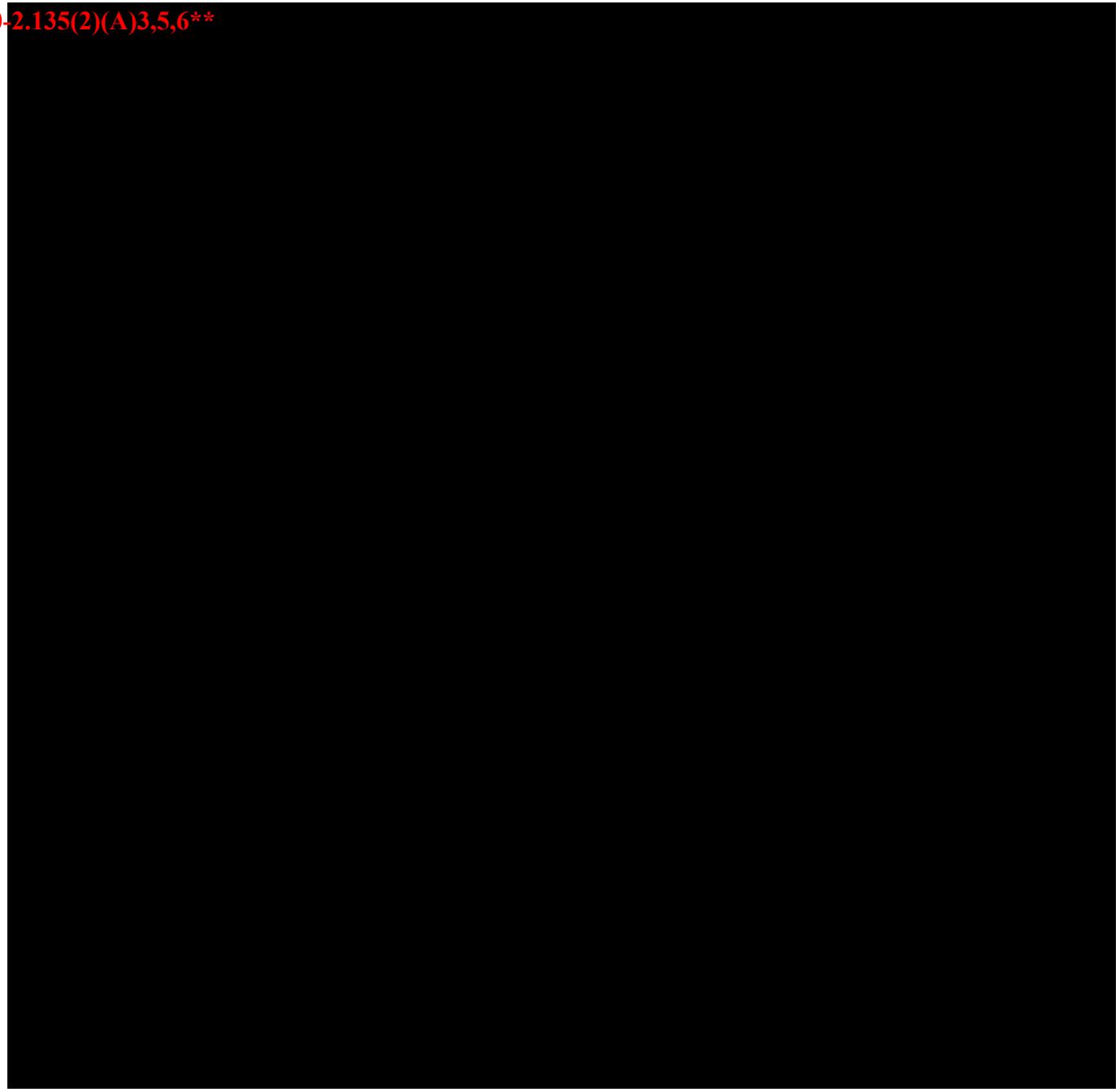

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APPENDIX C - SYSTEM UPGRADE COST

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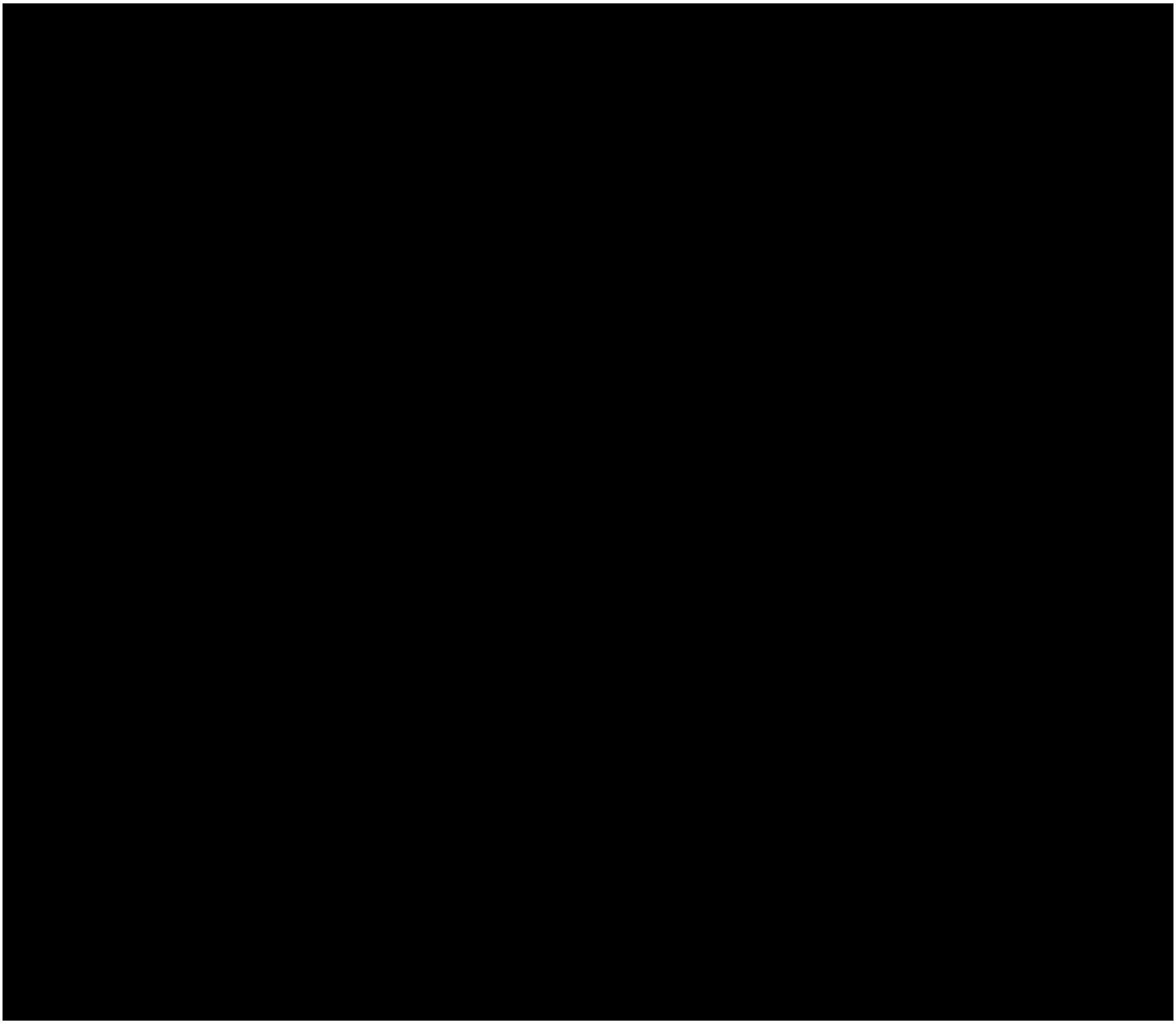

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