

CONFIDENTIAL DESIGNATIONS

The Empire District Electric Company d/b/a Liberty

Case No. EA-2025-0299

RE: Portions of the Direct Testimony of Aaron J. Doll and Confidential Direct Schedule AJD-2

The information is designated “Confidential” in accordance with Commission Rule 20 CSR 4240-2.135(2)(A)3, and/or 5 due to the nature of the material regarding market-specific information relating to services offered in competition with others and goods or services purchased or acquired for use by a company in providing services to the customer. Confidential Direct Schedule AJD-2 is work produced by internal or external auditors, consultants, or attorneys. The confidentiality shall be maintained consistent with the referenced Rule and/or Section 386.480, RSMo., as the case may be.

Exhibit No.: _____
Issue(s): Generation Need
Witness: Aaron J. Doll
Type of Exhibit: Direct Testimony
Sponsoring Party: The Empire District
Electric Company d/b/a Liberty
Case No.: EA-2025-0299
Date Testimony Prepared: October 2025

**Before the Public Service Commission
of the State of Missouri**

Direct Testimony

of

Aaron J. Doll

on behalf of

The Empire District Electric Company d/b/a Liberty

October 24, 2025



****DENOTES CONFIDENTIAL****
20 CSR 4240-2.135(2)(A)3

PUBLIC VERSION

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THE EMPIRE DISTRICT ELECTRIC COMPANY D/B/A LIBERTY
BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION
CASE NO. EA-2025-0299

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DIRECT TESTIMONY OF AARON J. DOLL
THE EMPIRE DISTRICT ELECTRIC COMPANY D/B/A LIBERTY
BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION
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1 **I. INTRODUCTION**

2 **Q. Please state your name and business address.**

3 A. My name is Aaron J. Doll. My business address is 602 South Joplin Avenue, Joplin,
4 Missouri.

5 **Q. By whom are you employed and in what capacity?**

6 A. I am employed by Liberty Utilities Service Corp. (“LUSC”) as Senior Director of
7 Energy Strategy for the Liberty Central Region, which includes The Empire District
8 Electric Company d/b/a Liberty (“Liberty” or the “Company”).

9 **Q. On whose behalf are you testifying in this proceeding?**

10 A. I am testifying on behalf of Liberty, the applicant in this docket.

11 **Q. Please describe your educational and professional background.**

12 A. I graduated from Missouri State University in 2003 with a Bachelor of Science degree
13 in Psychology and a minor in Philosophy. I received my Master of Business
14 Administration from Missouri State University in 2008.

15 I have worked for Liberty for approximately 19 years. I worked in the Planning
16 and Regulatory Department for six years as a Planning Analyst and was responsible for
17 load forecasting, weather normalization, and sales and revenue variance analysis. In
18 2012, I transferred to the Supply Management Department as the Market Risk Manager
19 and eventually became the Manager of Market Settlements and Systems. In this
20 capacity, I worked to facilitate the migration of the daily power marketing activities
21 from the Southwest Power Pool, Inc. (“SPP”) Energy Imbalance Market (“EIS”) to the

1 SPP Integrated Marketplace (“IM”) and oversaw the procurement of the Transmission
2 Congestion Rights (“TCRs”). Additionally, I provided oversight of meter management,
3 market settlements, and market applications.

4 In 2020, I was promoted to my current position of Senior Director of Energy
5 Strategy. In this role, I oversee procurement of fuel for electrical generation, the day-
6 to-day interfacing, systems, and settlements with SPP as it relates to the IM, long-term
7 and short-term load forecasting, and production cost modeling. I also provide
8 regulatory support relating to those responsibilities.

9 **Q. Have you previously testified before the Missouri Public Service Commission**
10 **(“Commission”) or any other regulatory agency?**

11 A. Yes, I have testified before this Commission, the Kansas Corporation Commission, the
12 Oklahoma Corporation Commission, the Arkansas Public Service Commission, the
13 Kentucky Public Service Commission, and the New Hampshire Public Utilities
14 Commission.

15 **Q. What is the purpose of your direct testimony in this proceeding?**

16 A. I demonstrate that the Company’s request for authority to construct a new natural gas-
17 fired generating unit satisfies the requirements for a Certificate of Convenience and
18 Necessity (“CCN”) under Missouri law and Commission rules. Specifically, I establish
19 the need for the proposed facility by referencing the Company’s most recently filed
20 Integrated Resource Plan (“IRP”)¹, which reflects a thorough evaluation of future
21 resource requirements and planning assumptions. I explain the key drivers behind this
22 need, including the evolving resource adequacy framework of the Southwest Power
23 Pool (“SPP”) and its impact on capacity obligations, reliability standards, and reserve

¹ EO-2024-0280.

1 margins. I also place this need in the broader context of Missouri’s planning and
2 regulatory obligations, demonstrating how the proposal aligns with state policy
3 objectives, including least-cost planning principles, reliability, and customer benefits.

4 **II. BACKGROUND**

5 **Q. What did the Company’s most recent triennial IRP select as a generation addition**
6 **in the Company’s preferred plan?**

7 A. In the Company’s most recent triennial IRP, the Preferred Plan (Plan 4) includes the
8 addition of 240 MW of natural gas frame combustion turbine capacity by 2029 and a
9 second 240 MW natural gas frame combustion in 2036. The IRP modeled that the SPP
10 Planning Reserve Margin (“PRM”) for Winter would be 36% beginning in 2026 and
11 will rise to 44% in 2029. This escalation, coupled with the implementation of new
12 accreditation methodologies for generating units, substantially heightens the need for
13 winter-accredited capacity. Consequently, the modeling shows that Plan 4 delivers the
14 lowest Long-Term Net Present Value of Revenue Requirement (“NPVRR”) and one of
15 the lowest short-term NPVRR while also maintaining a reliable and resilient portfolio
16 under key critical uncertain factors.

17 **Q. How does the Company’s 2025 IRP, inclusive of the recently filed Preferred Plan**
18 **Update², compare to the 2022 IRP?**

19 A. Below is a graphic that contrasts the 2025 IRP Preferred Plan, inclusive of the Preferred
20 Plan Update, with the Preferred Plan from the 2022 IRP. The notable differences
21 include:

- 22 • A 4.5 year extension of the Elk River Wind PPA to help bridge the Winter
23 capacity shortfall

² Filed October 16, 2025 in EO-2024-0280.

- 1 • Technology change from Reciprocating Internal Combustion Engines
2 (“RICE”) for the replacement of the Riverton 10/11 to smaller combustion
3 turbines (“CT”)³
4 • 240 MW Frame CT in 2029 and 2036
5 • Removal of all solar additions with the exception of a utility-scale solar project
6 in 2035
7 • Removal of Realistic Achievable Potential (“RAP”) Demand Side Management
8 (“DSM”) bundle in 2027

Year	2022 IRP Preferred Plan	2025 IRP Preferred Plan
2025	Elk River PPA (150 MW) Riverton 10/11 (27 MW) RICE (Riverton 10/11 Replacement)	Elk River PPA (150 MW) Riverton 10/11 (27 MW) CT (Riverton 10/11 Replacement)
2026		
2027	Utility-Scale Solar+Storage (2:1) (105 MW)	RAP DSM (Low, Mid, High Cost Bundles)
2028	Meridian Way Wind (105 MW)	Meridian Way Wind (105 MW)
2029		Frame CT (240 MW)
2030	Utility-Scale Solar (70 MW)	
2031	Distributed Solar (10 MW) Distributed Solar+Storage (2:1) (3 MW)	
2032	Distributed Solar (10 MW) Distributed Solar+Storage (2:1) (6 MW)	
2033	Utility-Scale Solar (100 MW) Distributed Solar (10 MW)	
2034	Distributed Solar (10 MW)	
2035	Energy Center 1/2 (160 MW) Distributed Solar (10 MW)	Energy Center 1/2 (160 MW) Utility-Scale Solar (150 MW)
2036	Distributed Solar (10 MW)	Frame CT (240 MW)

Retirements

Generation Additions

Extensions

9

³ Update provided in 2023 IRP Annual Update in EO-2023-0294 but not considered a change from Preferred Plan.

1 **Q. Explain the changes in the resource adequacy construct that resulted in a**
2 **significantly different IRP Preferred Plan within a 3-year timeframe.**

3 A. The following key events illustrate how SPP's resource adequacy (RA) construct
4 evolved substantially between 2021 and 2024, culminating in a new planning
5 environment that materially altered the Company's preferred plan:

6 • **February 2021 – Winter Storm Uri**

- 7 ○ SPP declared multiple Energy Emergency Alerts (“EEAs”) under
8 extreme cold conditions, ultimately implementing controlled load shed.

9 The event exposed critical vulnerabilities in fuel supply, resource
10 availability, and winter preparedness across the SPP footprint.

11 • **July 2021 – SPP Comprehensive Review of Winter Storm Uri**

- 12 ○ At the direction of the SPP Board of Directors (“SPP BOD”), SPP issued
13 the *Comprehensive Review of SPP's Response to the February 2021*
14 *Winter Storm*. The report identified Tier 1 and Tier 2 recommendations
15 covering fuel assurance, outage policy, planning processes,
16 accreditation, and communication protocols.

17 • **August 2021 – SPP Creates the Improved Resource Availability Task**
18 **Force (“IRATF”)**

- 19 ○ The SPP BOD created the IRATF to implement the highest-priority
20 (Tier 1) recommendations from the Comprehensive Review, with a
21 specific focus on improving fuel assurance, enhancing resource
22 availability, and strengthening winter operational readiness.

23 • **September 2022 – SPP Recommendation to Increase the Planning Reserve**
24 **Margin increase from 12% to 15%**

- 1 ○ To maintain the 1-day-in-10-year reliability criterion, SPP staff
2 recommended increasing the Planning Reserve Margin (“PRM”) to 15
3 %. At that time, SPP had not yet adopted separate seasonal PRMs, and
4 the winter PRM remained advisory with no formal compliance
5 penalties.

6 • **December 2022 – Winter Storm Elliot**

- 7 ○ SPP experienced peak winter loads exceeding those of Winter Storm
8 Uri, though the duration of Elliott was shorter. The event demonstrated
9 improved performance within the SPP footprint while reaffirming the
10 need to continue implementing post-Uri reforms. Although SPP avoided
11 system-wide load shed, the Company curtailed approximately 29 MW
12 of load in the Branson area on December 22 due to a localized reliability
13 event.

14 • **January 2023 – Creation of the Resource Energy and Adequacy
15 Leadership (“REAL”) Team**

- 16 ○ The SPP Regional State Committee established the REAL Team to
17 prioritize and recommend policy initiatives aimed at enhancing resource
18 and energy adequacy. The REAL Team’s mandate included assessing
19 the evolving RA construct and anticipating challenges stemming from
20 changing resource portfolios, extreme weather, increasing demand, and
21 evolving consumer behavior.

1 • **2024 – Major Reforms to the SPP Resource Adequacy Construct**

- 2 ○ SPP advanced Performance-Based Accreditation (“PBA”) and
3 Effective Load Carrying Capability (“ELCC”) methodologies to align
4 accredited capacity values with demonstrated reliability contributions.
5 ○ Establishment of seasonal PRMs through SPP Open Access
6 Transmission Tariff (“OATT”) revisions, formally separating Summer
7 and winter PRMs
8 ○ Setting of base PRMs of 16% for the Summer 2026 season and 36% for
9 the Winter 2026 seasons.

10 • **May 2025 – SPP BOD approves SPP Expedited Resource Adequacy Study**
11 **proposal**

- 12 ○ SPP BOD approves ERAS proposal on May 6, 2025, SPP files ERAS
13 at FERC on May 22, 2025, and FERC approves filing July 21, 2025

14 **Q. Was the Company able to accommodate all of these changes into the Company’s**
15 **most recent IRP filed in April 2025?**

16 **A.** Although these reforms were finalized in close proximity to the IRP study cycle, the
17 Company incorporated nearly all known changes into its modeling. Assumptions were
18 necessary for accredited capacity values due to the limited historical dataset available
19 for the new PBA methodology. The Company also relied on SPP forecasts for future
20 PRM escalation and ELCC accreditation factors. However, the most consequential
21 development affecting the IRP analysis was the creation and pending implementation
22 of the Expedited Resource Adequacy Study (“ERAS”) process.

23 **Q. Please explain the ERAS process.**

1 A. The Expedited Resource Adequacy Study (“ERAS”) is a one-time SPP study process
2 designed to accelerate the interconnection of new generation needed to meet near-term
3 adequacy requirements. ERAS operates outside the standard Generation
4 Interconnection (“GI”) queue and follows a condensed study timeline. The process is
5 available to Load Responsible Entities (“LREs”) demonstrating a forecasted capacity
6 deficiency for either the Summer or Winter season by 2030, based on SPP-defined
7 criteria. The SPP ERAS Recommendation Report (“RR”) is attached to this testimony
8 as Direct Schedule AJD-1.

9 **Q. Did the SPP forecast the Company to have a capacity shortfall in 2030?**

10 A. Yes. The SPP forecasted an LRE excess of **[REDACTED]** for the Summer of 2030 and a
11 LRE deficiency of **[REDACTED]** for Winter 2030/2031.

12 **Q. How do these figures compare with your 2025 IRP forecasts for 2030?**

13 A. While differences exist between the methodologies used by the SPP criteria and those
14 in the Company’s IRP, the overall conclusion is consistent: additional capacity will be
15 required by 2030 to maintain compliance with evolving resource-adequacy
16 requirements.

17 **Q. Did the new generation being requested in this docket (EA-2025-0299) utilize the
18 ERAS process for generation interconnection?**

19 A. Yes. The Company submitted its ERAS application on September 26, 2025 and
20 following correction of minor deficiencies, SPP confirmed that the application had
21 been accepted into the ERAS study queue on October 14, 2025.

22 **Q. How did ERAS impact the 2025 IRP results?**

23 A. SPP’s evolving RA construct created a rapidly emerging capacity shortfall, while
24 conventional generation-interconnection processes remained lengthy and uncertain.

ERAS offered the only viable mechanism to align new resource additions with the near-term adequacy timeline. During the Company's 2025 IRP development, Liberty closely monitored SPP's stakeholder process and adjusted planning parameters to reflect the potential approval of ERAS. The IRP assumed that if ERAS were approved by SPP's Board and subsequently by FERC, new generation could feasibly achieve commercial operation by 2029. This modification, loosening the timing constraint on new resource additions in anticipation of ERAS approval, directly influenced the IRP modeling outcomes and led to the selection of Plan 4 as the Company's Preferred Plan.

III. APRIL 2025 INTEGRATED RESOURCE PLAN

Q. How did the Company determine the criteria for its selection of Plan 4 as the Company's April 2025 IRP Preferred Plan?

A. The Company selected Plan 4 as its Preferred Plan in accordance with 20 CSR 4240-22.010(2), which directs utilities to identify a long-term resource strategy that provides safe, reliable, and efficient service at just and reasonable rates, consistent with state energy and environmental policy and in the public interest.

Consistent with 20 CSR 4240-22.010(2)(C), the Company used the minimization of the present value of long-run utility costs as the primary selection criterion, while also considering the mitigation of critical uncertain factors such as fuel cost volatility, load variability, legal compliance, and potential rate impacts. Each candidate plan was further evaluated for its ability to maintain environmental compliance and meet applicable reliability standards.

A scorecard approach was used to compare alternatives across cost, risk, and compliance measures. Plan 4 demonstrated the best overall balance of long-term cost

efficiency, risk resilience, and regulatory alignment, leading to its selection as the Company's Preferred Plan.

Below is a graphic demonstrating the scorecard approach the Company used in its evaluation.

Objective	Metric	Metric Description	Portfolio											
			1	2	3	4	5	6	7	8	9	10	11	12
Customer Affordability	Short-Term NPV Revenue Requirement	Total short-term (5-year) annual costs paid by ratepayers on a net present value basis under Base Case scenario	\$2,765	\$2,768	\$2,765	\$2,767	\$2,792	\$2,766	\$2,852	\$2,848	\$2,850	\$2,797	\$2,850	\$2,765
	Long-Term NPV Revenue Requirement	Total long-term (20-year) annual costs paid by ratepayers on a net present value basis under Base Case scenario	\$8,698	\$8,676	\$8,694	\$8,574	\$8,820	\$8,689	\$9,179	\$9,373	\$9,623	\$9,712	\$9,388	\$8,815
Risk Mitigation	Resilience to Critical Uncertain Factors	Expected value of 20-year PVRs when evaluated against all critical uncertain factor probabilities	\$8,666	\$8,649	\$8,696	\$8,541	\$8,812	\$8,693	\$9,373	\$9,572	\$9,890	\$10,203	\$9,590	\$8,859
		Range (delta) between higher-cost (P95) and median (P50) PVR outcomes when calculated against the CUF probabilities	\$528	\$523	\$666	\$657	\$659	\$672	\$1,387	\$1,452	\$1,551	\$2,300	\$1,391	\$822
Maintaining Reliability	Planning Reserves	% Reserve Margin, CUFs Average (Summer Winter)	27.2% 25.9%	27.0% 25.6%	28.6% 25.7%	31.6% 28.9%	32.0% 29.4%	28.3% 25.4%	56.2% 32.2%	55.5% 31.9%	56.6% 33.5%	49.8% 34.3%	56.2% 32.2%	31.5% 26.2%
	Operational Flexibility	Dispatchable capacity (Summer UCAP MW) included in portfolio in 2044	1,351	1,347	1,328	1,330	1,334	1,324	847	847	847	1,147	847	1,313
Environmental Sustainability	Carbon Reduction	Million short tons CO ₂ emissions in 2044 (scope 1/2 only)	1,761	1,735	1,761	1,752	1,783	1,735	1,559	1,559	1,559	1,559	1,559	1,801

Q. How is the calculation of the Net Present Value of Revenue Requirement performed in the IRP?

A. The Net Present Value of Revenue Requirement ("NPVRR") represents the discounted value of the Company's long-term cost of providing electric service under each resource plan. Annual revenue requirements include all operating expenses, capital-related costs, and a return on rate base, along with estimated costs for probable environmental compliance. Capital investments increase the rate base, while depreciation and amortization reduce it over time.

For each alternative plan, the annual revenue requirements are discounted using the Company's after-tax weighted average cost of capital (WACC) to produce the

1 NPVRR. This value provides a consistent measure of long-term cost and serves as the
2 primary basis for comparing and selecting the Preferred Plan.

3 **Q. How did the Company evaluate its selection of Plan 4 for reliability?**

4 A. The Company assessed reliability using several key measures. Each candidate plan was
5 first tested for compliance with SPP's Planning Reserve Margin ("PRM") under
6 varying critical uncertain factors such as load growth and resource performance. The
7 Company also evaluated each portfolio's share of dispatchable capacity relative to
8 projected load to ensure system flexibility and resilience.

9 To supplement these internal assessments, the Company engaged Astrapé
10 Consulting (now part of PowerGEM) to perform an independent resource adequacy
11 analysis using the Strategic Energy Risk Valuation Model ("SERVM")—a state-of-
12 the-art multi-area reliability and production simulation tool. SERVM provides
13 probabilistic metrics such as Loss of Load Expectation (LOLE), Loss of Load Hours
14 (LOLH), and Expected Unserved Energy (EUE) across both summer and winter
15 seasons.

16 The analysis modeled over 40 years of weather variability, load-forecast
17 uncertainty, and thousands of random unit-performance draws to generate statistically
18 robust reliability results. Five portfolios, including the Preferred Plan, were simulated
19 for study years 2029, 2032, and 2040. The SERVM results confirmed that Plan 4 meets
20 reliability targets across all scenarios while maintaining cost efficiency and system
21 adequacy over the planning horizon.

1 **IV. OCTOBER 2025 INTEGRATED RESOURCE PLAN – PREFERRED PLAN**
2 **UPDATE**

3 **Q. Has the Company made any changes to its Preferred Plan since it published its**
4 **most recent IRP on April 1, 2025?**

5 A. Yes. Liberty has made several substantive modifications to its Preferred Plan since
6 filing the 2025 Integrated Resource Plan on April 1, 2025. The Company concluded
7 that its originally selected Plan 4 was no longer appropriate and, pursuant to 20 CSR
8 4240-22.080, submitted an October 2025 update describing the changes. The updated
9 plan removes the 175 MW utility-scale solar project previously slated for 2027,
10 eliminates all demand-side programs from the planning horizon following the
11 withdrawal of its MEEIA Cycle 2 application, extends the Elk River Wind Farm
12 purchased-power agreement from 2025 to March 2030, and increases the amount of
13 distributed reciprocating internal-combustion-engine (RICE) generation to 24 MW in
14 2041 to maintain capacity balance.

15 Each of these adjustments reflects updated market and regulatory conditions.
16 Liberty explained that the solar project's removal was driven by the Southwest Power
17 Pool's move to a seasonal accreditation framework that assigns solar very limited
18 winter capacity value, creating a mismatch with the Company's winter-peaking system.
19 Likewise, the discontinuation of demand-side management programs followed the
20 Missouri Public Service Commission's concerns over the Company's MEEIA Cycle
21 2's alignment with the statute's intent, leading to the formal withdrawal of that filing
22 in April 2025. The five-year extension of the Elk River PPA provides near-term
23 capacity coverage that compensates for the loss of both the solar addition and the DSM
24 portfolio, avoiding an immediate shortfall.

1 The Updated Preferred Plan also modestly expands distributed gas generation
2 later in the horizon adding 24 MW of RICE units in 2041 instead of 2 MW to offset the
3 capacity gap created by the other resource removals. These cumulative revisions lower
4 the plan's 20-year present-value revenue requirement by roughly \$58 million and its
5 30-year value by \$34 million relative to the April 2025 version, largely because the
6 Company avoids the capital and operating costs of the firm solar project and DSM
7 investments. Although these savings are partly offset by higher market purchases and
8 the cost of additional RICE capacity, the overall portfolio remains among the lowest-
9 risk options under the same critical-uncertainty analysis applied in the triennial IRP.

10 Finally, Liberty clarified that these updates do not trigger new near-term
11 implementation actions beyond the continuation of development for the 240-MW
12 simple-cycle gas turbine planned for 2029. The Company's revised acquisition strategy
13 through 2028 is therefore simplified: it centers on the extension of the Elk River
14 contract and maintaining progress on the single-cycle frame CT, with no planned
15 renewable until solar in 2035 and no DSM additions during this period. Overall, the
16 October 2025 filing confirms that the Preferred Plan has been materially modified to
17 reflect current market realities while maintaining compliance with Chapter 22 resource-
18 planning requirements. A copy of the 2025 Integrated Resource Plan Preferred Plan
19 Update is attached to my testimony as **Confidential Direct Schedule AJD-2**.

20 **V. CONCLUSION**

21 **Q. Please summarize your direct testimony.**

22 A. The Company's resource plan demonstrates a clear and data-driven approach to
23 ensuring reliable electric service for customers amid a rapidly changing regional and
24 regulatory environment. Modeling showed that tightening resource adequacy

1 requirements across the SPP, particularly the sharp rise in winter planning reserve
2 margins, will create a significant need for new firm capacity before 2030. In response,
3 the plan prioritizes the addition of a 240 MW dispatchable natural gas-fired generator
4 to provide dependable supply during extreme winter conditions. The Company's
5 analysis, confirmed through third-party reliability modeling, found this configuration
6 to deliver a balanced, resilient portfolio capable of meeting long-term system
7 obligations under a wide range of uncertain fuel, load, and policy scenarios.

8 From an economic standpoint, the Company's modeling evaluated multiple
9 portfolios using the net present value of revenue requirement as the primary measure
10 of cost efficiency. The Preferred Plan emerged as the lowest-cost option over both 20-
11 and 30-year study horizons, while maintaining reliability and flexibility to comply with
12 evolving environmental and market rules. The plan's subsequent update in October
13 2025 further improved cost performance by reducing projected revenue requirements
14 by tens of millions of dollars and creating a balanced portfolio that better aligns with
15 the immediate capacity needs identified by the SPP. While renewable resources remain
16 an important component of the Company's long-term supply mix, the near-term need
17 for resources with significant winter accredited capacity necessitated prioritizing
18 dispatchable generation additions and extending existing firm supply arrangements
19 such as the Elk River Wind contract as bridge capacity. These refinements produce a
20 more cost-effective and seasonally resilient plan that supports reliability without
21 overcommitting capital in the current planning period.

22 The updated plan also reflects a measured and adaptive approach to system
23 planning in the public interest. Following regional reforms and lessons learned from
24 recent winter reliability events, the Company aligned its long-term strategy with SPP's

1 evolving accreditation framework and the introduction of the Expedited Resource
2 Adequacy Study (ERAS) process, an initiative specifically designed to fast-track
3 resources critical to system reliability. By pursuing participation in ERAS and
4 maintaining alignment with SPP's reliability standards, the updated plan ensures that
5 new generation can be developed and interconnected within the timeframes needed to
6 preserve system adequacy, thereby supporting broader regional stability and customer
7 protection from capacity shortfalls.

8 Taken together, the Preferred Plan and its 2025 update represent a balanced and
9 forward-looking strategy that responsibly meets future capacity needs, minimizes
10 overall system costs, and reinforces reliability for Liberty's service area. The
11 Company's actions demonstrate prudent planning grounded in economic discipline and
12 system reliability, ensuring that customers continue to receive safe and affordable
13 service under conditions that promote the long-term public interest.

14 **Q. Does this conclude your direct testimony at this time?**

15 **A.** Yes.

VERIFICATION

I, Aaron J. Doll, under penalty of perjury, on this 24th day of October, 2025, declare that the foregoing is true and correct to the best of my knowledge and belief.

/s/ Aaron J. Doll