

3. OPC's characterization of the matter as a "demand[ed]...customer trade" is not an apt characterization. The Company has a cognizable interest in this docket, which the Commission recognized when it granted its unopposed motion to intervene. Over the course of the proceeding, White River and Liberty, both represented by counsel, negotiated a resolution of the issues in dispute such that the interests of both White River and Liberty would be satisfied. It is this very type of resolution that should be favored, where parties work constructively to resolve matters that meet both of their interests. OPC's suggestion that there is something untoward about the negotiation of the Stipulation and Agreement is misplaced.

4. OPC then requests that the Commission take punitive action against the Company by denying the Stipulation and Agreement so that the Company does not have the opportunity to serve new customers in the future because of its recent billing issues. The Commission should deny OPC's request. The Company has been working assiduously to address its billing issues which is documented in the recent Supplemental Stipulation filed in ER-2024-0261. Further, it is in all customers' interests to expand the Company's customer base through agreements such as the one before the Commission in this docket. Any future increase in the Company's customer base will result in the ability to spread operating costs across more customers, further improving efficiencies of service.

WHEREFORE, Liberty respectfully requests that the Commission deny OPC's Objection and approve the Stipulation and Agreement and grant such other relief as is just and equitable.

Respectfully submitted,

THE EMPIRE DISTRICT ELECTRIC COMPANY

/s/ Sarah B. Knowlton

Sarah B. Knowlton MBE #71361

Senior Vice President & General Counsel, Liberty Utilities

116 North Main Street

Concord, New Hampshire 03301

Phone: 603-327-9857

E-Mail: Sarah.Knowlton@LibertyUtilities.com

CERTIFICATE OF SERVICE

I hereby certify that the above document was filed in EFIS on this 29th of December, 2025, with notification of the same being sent to all counsel of record. This filing was also sent by electronic transmission to all counsel of record.

/s/ Sarah B. Knowlton