

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

In the Matter of the Application of The Empire District)
Electric Company d/b/a Liberty to Obtain a Certificate of) Case No. EA-2025-0299
Convenience and Necessity to Support Resource Adequacy)

**LIBERTY’S REQUEST FOR PROCEDURAL SCHEDULE AND
RESPONSE REGARDING MOTION FOR LOCAL PUBLIC HEARINGS**

COMES NOW The Empire District Electric Company d/b/a Liberty (“Liberty” or the “Company”), and provides a proposed procedural schedule for the Commission’s consideration as well as a response regarding the Motion for Local Public Hearings filed by Renew Missouri Advocates and the Office of the Public Counsel. In support hereof, Liberty respectfully states as follows to the Missouri Public Service Commission (“Commission”):

1. This case involves Liberty’s October 24, 2025, request for a Certificate of Convenience and Necessity for a 250 MW single combustion turbine (the “CCN Request”). The proposed asset is designed to implement the supply-side resource acquisition strategy outlined in Liberty’s 2025 IRP, which was developed in response to evolving Southwest Power Pool (“SPP”) resource adequacy requirements and recent market and regulatory changes.

2. As set forth in the proposed procedural schedule below, the Company is seeking a final order of the Commission by August 1, 2026. Obtaining a final Commission order by August 1, 2026, will materially reduce the financial risk assumed by the Company in advancing engineering, procurement, and contracting activities necessary to maintain schedule certainty. Absent timely regulatory authorization, the Company would face increased risk of schedule compression, higher procurement costs, or potential loss of its Expedited Resource Adequacy Study (“ERAS”) interconnection rights, each of which could ultimately increase costs and reduce reliability in its service to customers.

Background on the ERAS Process

3. Liberty obtained SPP approval for the project through SPP's ERAS process, which was approved by the Federal Energy Regulatory Commission ("FERC") on July 21, 2025. The ERAS submission window for prospective generating resources was open September 2 - October 2, 2025. The Company successfully submitted its candidate resource into the ERAS process, which required increased financial security and study deposits, more stringent demonstrations of site control, and additional attestations and development milestones beyond those typically required under the standard generation interconnection process. The Company filed its CCN Request herein only 22 days following the close of the ERAS submission window.

4. Pursuant to Attachment AW of the SPP Open Access Transmission Tariff ("OATT"), resources accepted into the ERAS process must achieve commercial operation by no later than five years from the closing of the ERAS window. As such, Liberty's new generating facility must reach commercial operation by October 2, 2030, in order to retain its ERAS-related Generation Interconnection Agreement ("GIA"). Failure to meet this milestone creates a risk of losing the interconnection position obtained through ERAS, which would introduce delay and additional cost exposure to customers.

5. Given current industry conditions such as extended equipment manufacturing lead times, supply chain constraints, and competition for specialized construction labor, the Company's project schedule does not allow for a strictly sequential process in which all engineering and procurement activities begin only after final regulatory approval is received. Certain development and execution activities must instead proceed in parallel with the Commission's regulatory review process to preserve the Company's ability to meet the ERAS-required commercial operation date.

Proposed Procedural Schedule

6. Liberty requests the establishment of a procedural schedule as follows:

Supplemental Direct Testimony – Liberty	March 12, 2026
Staff Recommendation/Non-Company Rebuttal Testimony	April 17, 2026
Reply Testimony – Liberty	May 13, 2026
Issues List	May 20, 2026
Position Statements	June 1, 2026
Hearing	Week of June 8
Post-Hearing Briefs	July 10, 2026

Liberty’s Comments on the Request for Local Public Hearings

7. As noted in the CCN Request, the new unit will be located at the Company’s State Line Power Station in Joplin, Missouri. All proposed construction will be within the existing State Line Power Station property boundaries, and, as such, no landowner notice was required in connection with the CCN Request. While the Company appreciates input from its customers and the public, the Company does not believe that a local public hearing is a necessity in this matter in order for the Commission to make a public interest determination under RSMo. §393.170 and Commission Rule 20 CSR 4240-20.045.

8. As such, Liberty respectfully requests that the Commission approve the proposed procedural schedule. If the Commission believes a public hearing would be helpful, Liberty suggests virtual instead of in-person and requests that the date be at least 33 days from the date of the order establishing the same, to allow for notice to be included with customer bills (as opposed to through a separate mailing).

WHEREFORE, Liberty submits this Request for Procedural Schedule and Response Regarding Motion for Local Public Hearings and requests such relief as is just and proper under the circumstances.

Respectfully submitted,

/s/ Diana C. Carter

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Counsel for The Empire District Electric Company d/b/a Liberty

CERTIFICATE OF SERVICE

I hereby certify that the above document was filed in EFIS on this 3rd day of March, 2026, and sent by electronic transmission to all counsel of record.

/s/ Diana C. Carter