



The Empire District Electric Company d/b/a Liberty
Case No. EA-2025-0299
Missouri Public Service Commission Data Request - 0027

Data Request Received: 2025-11-24

Response Date: 2025-12-12

Request No. 0027

Witness/Respondent: Shaen Rooney

Submitted by: Jared Giacone, Jared.Giacone@psc.mo.gov

REQUEST:

Please provide a general timeline graphic by month of the major milestones from Engineering, Procurement and Construction ("EPC") Request For Proposals ("RFP"), review and award of RFP, finalized budget, major component procurement, construction, sitework, gas extension, transmission extension and unit completion/in-service.

RESPONSE:

Please see the attached "EA-2025-0299 – DR 0027 – Milestone Timeline.pdf".



The Empire District Electric Company d/b/a Liberty
Case No. EA-2025-0299
Missouri Public Service Commission Data Request - 0027.1

Data Request Received: 2026-02-04

Supplement Response Date: 2026-04-09

Request No. 0027.1

Witness/Respondent: Shaen Rooney

Submitted by: Trevor Rucker, trevor.rucker@psc.mo.gov

REQUEST:

In its response to Staff Data Request 0027, Liberty provided a milestone timeline that showed an in-service date for the CTG project of April 2030. Paragraph 18 of Liberty's Application also stated that the CTG project will be available for service in Q2 of 2030. In Liberty's IRP Preferred Plan Update filed in Commission Case No. EO-2024-0280, Liberty showed that a single cycle frame gas combustion turbine would be set for operation by 2029. Please explain the different dates for the CTG project to go into operation/service.

SUPPLEMENTAL RESPONSE 04/09/2026:

The explanation of the differing in in-service dates provided in the original response is still valid. As development has advanced and the schedule has been refined, the expected in-service date has moved from April 2030 to August 2030.

ORIGINAL RESPONSE 02-24-2026:

The differing in-service dates for the combustion turbine generator ("CTG") reflect the progression from planning-level assumptions used in the Integrated Resource Plan ("IRP") to more refined development estimates as the project has advanced through regulatory and procurement processes.

The Company's April 1, 2025 triennial IRP included a natural-gas-fired generating unit with a planning-level in-service assumption of 2029. That assumption was contingent upon implementation of the Southwest Power Pool's Expedited Resource Adequacy Study ("ERAS") construct, which SPP filed at the Federal Energy Regulatory Commission ("FERC") on May 22, 2025 and which FERC approved on July 21, 2025. Consistent with IRP practice, the 2029 date reflected a planning assumption used for portfolio evaluation rather than a final construction or commercial-operation commitment.

On October 15, 2025, the Company filed a Change in Preferred Resource Plan pursuant to 4 CSR 240-22.080(12). Preparation of that filing required completion of the analyses prescribed by the rule, which were conducted over a period of time prior to the October 15 filing date. During that analytical timeframe, there was less certainty regarding turbine procurement, engineering, and construction scheduling than exists today. As a result, the Company retained the IRP planning assumption for the CTG in that filing. The October 15 filing primarily addressed the removal of a previously assumed committed solar resource, removal of demand side programs, and the extension of an existing power purchase agreement to maintain adequate capacity margins until the CTG could be constructed.

On October 24, 2025, the Company filed its Certificate of Convenience and Necessity (“CCN”) application for the CTG. The CCN rules require a description of the projected construction schedule and anticipated in-service date based on the best information available at the time of filing. Given evolving turbine-supply and construction-schedule considerations and the absence of a finalized turbine supply agreement, the Company indicated in that filing that the CTG anticipates achieving commercial operation in the second quarter of 2030. That estimate reflects a development-level schedule based on updated procurement and construction information that became clearer after completion of the analyses supporting the October 15 Preferred Plan Update.

Because the Company has not yet finalized turbine procurement and construction contracts, the precise commercial-operation date remains subject to refinement. The IRP and Change in Preferred Resource Plan reflect planning-level assumptions available at the time those analyses were conducted, while the CCN filing reflects the most current project-development estimate available at the time of that filing. The Company will continue to update stakeholders as additional certainty becomes available. If the final in-service date is determined to be materially inconsistent with the Preferred Resource Plan, the Company will provide an appropriate Preferred Plan update consistent with 4 CSR 240-22.080(12).