

**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 for a ) **File No. EA-2025-0299**  
Certificate of Convenience and Necessity to )  
Support Resource Adequacy )

**JOINTLY PROPOSED LIST OF ISSUES AND WITNESSES, ORDER OF  
OPENING STATEMENTS, LIST AND ORDER OF WITNESSES,  
AND ORDER OF CROSS-EXAMINATION**

**COMES NOW** the Staff of the Missouri Public Service Commission, on behalf of itself and the parties to this docket, and hereby submits its proposed *List of Issues and Witnesses, Order of Opening Statements, List and Order of Witnesses, and Order of Cross-Examination* in accordance with the Procedural Schedule set for the above-captioned proceeding.

**I. List of Issues**

- A. Does the evidence establish that the generating facility featuring a single F-class combustion turbine with an approximate capacity of 250 MW to be located at the Company’s State Line Power Station in Joplin, Missouri (the “Project”), for which Liberty is seeking a certificate of convenience and necessity (“CCN”), is necessary or convenient for the public service?
  - 1. Should the Commission find that the Project satisfies the first *Tartan* factor of need?
  - 2. Should the Commission find that the Project satisfies the second *Tartan* factor of economic feasibility?
  - 3. Should the Commission find that the Project satisfies the third *Tartan* factor of ability to finance?
  - 4. Should the Commission find that the Project satisfies the fourth *Tartan* factor of qualified to construct?
  - 5. Should the Commission find that the Project is in the public interest and satisfies the fifth *Tartan* factor?
- B. If the Commission grants the CCN for the Project, what conditions, if any, should the Commission impose on the CCN?
- C. Should the Commission make a determination on the prudence of Liberty’s decision to operate or construct the Project subject to a subsequent review of costs

and applicable timelines, pursuant to Section (2)(C) of Commission Rule 20 CSR 4240-20.045?

- D. Should the Commission grant Liberty’s request that the Commission establish the Project costs and estimated construction period for the Project for purposes of potential consideration of construction work in progress (“CWIP”) recovery in a future rate proceeding, pursuant to RSMo. §393.135.2? If so:
1. What is the appropriate amount of estimated Project costs?
  2. What is the appropriate estimated construction period for the Project?
  3. Considering the answers to subparts (1) and (2), what amount of CWIP should the Commission determine may be included in rate base?

**II. Order of Opening Statements**

Liberty  
Staff of the Missouri Public Service Commission (“Staff”)  
Renew Missouri Advocates d/b/a Renew Missouri (“Renew Missouri”)  
Office of the Public Counsel (“OPC”)

**III. List and Order of Witnesses**

Shaen T. Rooney (Liberty)  
Charlotte T. Emery (Liberty)  
Aaron J. Doll (Liberty)  
Donald A. Fontana (Staff)  
Jared Giacone (Staff)  
Randall T. Jennings (Staff)  
Sarah L.K. Lange (Staff)  
Shawn E. Lange, PE (Staff)  
J Luebbert (Staff)  
Hari K. Poudel, Ph.D. (Staff)  
Trevor Rucker (Staff)  
Justin Tevie (Staff)  
Seoung Joun Won, Ph.D. (Staff)  
Philip A. Fracica (Renew Missouri)  
Jill Wade (OPC)  
John A. Robinett (OPC)  
Geoff Marke, Ph.D. (OPC)

**IV. Order of Cross-Examination**

**Liberty**  
Staff  
Renew Missouri  
OPC

**Staff of the Missouri Public Service Commission Witnesses**

Liberty  
Renew Missouri  
OPC

**Office of the Public Counsel Witnesses**

Renew Missouri  
Staff  
Liberty

Respectively Submitted,

/s/ Paul T. Graham

Paul T. Graham #30416  
Senior Staff Counsel  
P.O. Box 360  
Jefferson City, Mo 65102-0360  
(573) 522-8459  
[Paul.graham@psc.mo.gov](mailto:Paul.graham@psc.mo.gov)

Travis Pringle  
Chief Deputy Counsel  
Missouri Bar No. 71128

Attorneys for the Staff of the  
Missouri Public Service Commission

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 3rd day of June, 2026.

/s/ Paul T. Graham