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**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

September 11, 2026



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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 Vice President, Energy
7 Supply Services. In this capacity, I oversee system planning, resource planning, energy
8 market operations, commercial management, energy integration, and regulatory
9 support for Liberty utility operations. As part of these responsibilities, I provide
10 planning and operational support to The Empire District Electric Company d/b/a
11 Liberty (“Liberty” or the “Company”).

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

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

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

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

18 I have worked for Liberty for approximately 20 years. I worked in the Planning
19 and Regulatory Department for six years as a Planning Analyst and was responsible for
20 load forecasting, weather normalization, and sales and revenue variance analysis. In
21 2012, I transferred to the Supply Management Department as the Market Risk Manager

1 and eventually became the Manager of Market Settlements and Systems. In that role, I
2 helped facilitate the migration of the daily power marketing activities from the
3 Southwest Power Pool, Inc. (“SPP”) Energy Imbalance Market (“EIS”) to the SPP
4 Integrated Marketplace (“IM”) and oversaw the procurement of the Transmission
5 Congestion Rights (“TCRs”). I also provided oversight of meter management, market
6 settlements, and market applications.

7 In 2020, I was promoted to Senior Director of Energy Strategy. In that role, I
8 oversaw fuel procurement for electrical generation, the Company’s day-to-day
9 interface, systems, and settlements with SPP, long-term and short-term load
10 forecasting, production cost modeling and related regulatory support activities.

11 In 2026, I was promoted to Vice President, Energy Supply Services. In my
12 current role, I lead Liberty’s System Planning and Operations Team and am responsible
13 for system planning, resource planning, energy support and integration, energy market
14 operations, commercial management, strategic planning, and regulatory support.

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

17 A. Yes, I have testified before this Commission, the Kansas Corporation Commission, the
18 Oklahoma Corporation Commission, the Arkansas Public Service Commission, the
19 Kentucky Public Service Commission, and the New Hampshire Public Utilities
20 Commission.

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

22 A. The purpose of my direct testimony is to explain Liberty’s resource planning, resource
23 procurement, and interconnection framework as it relates to serving Large Load
24 customers under proposed Schedule TS-LL. First, I describe Liberty’s existing

1 resource planning process and discuss the extent to which the Company's current
2 system is capable of serving Large Load customers. I then will explain how Large
3 Load customer demand may be incorporated into future planning activities and discuss
4 the principles Liberty would use when evaluating and procuring generation and
5 transmission resources necessary to serve such customers. Next, I explain the Capacity
6 Support Charge and the rationale for including that charge within Schedule TS-LL.
7 Finally, I describe Liberty's Large Load interconnection process, recent modifications
8 to that process, and the Company's efforts to provide Large Load customers with a
9 viable path to power while protecting existing customers from the incremental costs
10 and risks associated with serving such load.

11 **II. RESOURCE PLANNING**

12 **Q. Can you please describe Liberty's existing resource planning processes?**

13 A. Liberty submits an Integrated Resource Plan ("IRP") to the Commission at least once
14 every three years as required under 20 CSR 4240-22. To develop its IRP, Liberty
15 undertakes a months-long planning process to identify the most effective way to meet
16 customer needs while providing reliable, affordable, and resilient service, consistent
17 with applicable state energy and environmental policies. Liberty uses various
18 techniques to assess market trends, environmental policy, and future load growth and
19 then develops a plan that best harmonizes the associated risks and opportunities.
20 Liberty also incorporates certain planning processes developed by SPP, such as the
21 accredited capacity ("ACAP") resource adequacy construct. Liberty then develops
22 multiple alternative resource plans and ultimately selects one as its "preferred" plan to
23 submit for Commission approval. To support a transparent planning process, Liberty
24 uses a scorecard approach to identify and document key tradeoffs between various

1 options. These scorecards are also important tools for stakeholders to understand how
2 Liberty evaluated its plans and selected the preferred option.

3 **Q. What planning horizon does Liberty’s current resource plan cover?**

4 A. Liberty’s current IRP covers a 20-year planning horizon between 2025 and 2044.

5 **Q. What resources is Liberty planning to retire under its existing resource plan?**

6 A. As indicated in Liberty’s most recent IRP (File No. EO-2024-0280), there are several
7 proposed upcoming retirements. These include retiring the 27 MW Riverton 10-11
8 natural gas turbines in 2026 (replaced with similarly sized combustion turbines), the
9 160 MW Energy Center 1 and Energy Center 2 natural gas plants in 2035, and the 84
10 MW Iatan 1 coal-fired power plant in 2039. In addition to these planned retirements,
11 Liberty is also planning for the expiration of the 150 MW Elk River Wind Farm
12 contract in 2030, the 105 MW Meridian Way Wind Farm contract in 2028, and the 50
13 MW Plum Point PPA for coal-fired generation unit in 2040.¹

14 **Q. What resources is Liberty planning to acquire under its existing resource plan?**

15 A. As described in detail in Liberty’s most recent IRP, the Company intends to acquire
16 two 240 MW gas-frame combustion turbines in 2029 and 2036, respectively and 150
17 MW of utility-scale solar in 2035, and another similarly sized facility in 2041. In
18 addition to these resource acquisitions, Liberty will plan to incorporate Distributed
19 Reciprocating Internal Combustion Engines (“RICE”) between 2041 and 2044 and a
20 small distributed storage project in the 2043 timeframe.²

¹ See Liberty 2025 Integrated Resource Plan Preferred Plan Update at 4 (Table 1), File No. EO-2024-0280 (Oct. 4, 2025).

² See Liberty 2025 Integrated Resource Plan Preferred Plan Update at 4 (Table 1), File No. EO-2024-0280 (Oct. 4, 2025).

1 **Q. Does Liberty’s existing Preferred Plan account for the anticipated demand from**
2 **any Large Load customers?**

3 A. No. Liberty’s 2025 IRP Preferred Plan does not include any anticipated demand from
4 prospective Large Load customers. However, as a Special Contemporary Issue
5 (“SCI”), the Company evaluated potential Large Load growth scenarios, as discussed
6 in Volume 6, Section 8.1.3 of the 2025 IRP. As part of that analysis, the Company
7 evaluated four additional resource portfolios designed to serve incremental demand
8 associated with a Large Load scenario.

9 Because the analysis was based on generalized assumptions regarding the size
10 and timing of potential Large Load additions, including an assumed load ramp, it
11 should not be viewed as a specific resource plan for serving an individual Large Load
12 customer, but does provide an illustrative example. The actual resources required to
13 serve a Large Load customer will depend on the size, timing, load characteristics, and
14 other specific circumstances of that customer, along with updated inputs and
15 assumptions based on current economic and policy conditions.

16 **Q. Is Liberty’s current system capable of serving Large Loads?**

17 A. To a limited extent, yes. The Company has existing system infrastructure that may
18 support additional load at certain locations and at certain levels of demand. For
19 example, if a Large Load customer seeks to implement a Load Ramp Term where its
20 load is below the peak load during the Fixed Term of the Electric Service Agreement
21 (“ESA”), the ESA might designate some System Contract Capacity whereby the Large
22 Load customer could utilize Liberty’s existing generation resources to serve that
23 Contract Capacity. However, the Company does not currently have sufficient resources
24 to serve substantial new Large Load customers without investment in additional

1 generation and transmission, particularly given the Company's current resource
2 adequacy position and its capacity requirements during the winter season.

3 The infrastructure necessary to serve a particular Large Load customer will
4 depend on several factors, including the size, location, timing, and operating
5 characteristics of the proposed load. In some locations, portions of the existing system
6 may have sufficient capability to accommodate additional load, while additional
7 generation, transmission, or other infrastructure may be required to provide the
8 remainder of the service.

9 As discussed in the direct testimony of Company witness Charlotte T. Emery,
10 Schedule TS-LL is structured so that the incremental costs necessary to serve a Large
11 Load customer are assigned to that customer or group of customers vis-à-vis Schedule
12 TS-LL rather than Non-Large Load customers. Accordingly, the Company can provide
13 a pathway to service even where all of the necessary infrastructure is not currently in
14 place, provided the required incremental investments can be made and the associated
15 incremental costs are borne by the Large Load customer. Consistent with our overall
16 Large Load customer philosophy, this framework will allow the Company to pursue
17 opportunities to serve Large Load customers and support economic development
18 within its service territory without requiring existing customers to fund the generation
19 and transmission investments needed to serve those loads.

20 **Q. Does Liberty anticipate incorporating the impacts of Large Load customer**
21 **demand into its future resource planning cycle?**

22 A. Yes. As Large Load customers become sufficiently certain, Liberty expects future
23 resource planning cycles to reflect their anticipated demand and the resources
24 associated with serving that demand. This will allow the Company's planning process

1 to appropriately reflect the expected composition and operation of the overall system,
2 including the impacts of Large Load customers on resource adequacy and other system
3 requirements.

4 However, inclusion of Large Load customer demand and associated resources
5 in the Company's planning process does not mean those resources would be planned
6 for or funded by the Company's existing customers. As I discuss below, resources
7 acquired specifically to serve Large Load customers should be subject to a different
8 planning and cost-responsibility framework.

9 **Q. How should resources developed to serve Large Load customers be considered in**
10 **Liberty's resource planning process?**

11 A. Given the structure of Schedule TS-LL, a Large Load customer requiring capacity
12 beyond that otherwise planned to serve the Company's existing customer base will be
13 responsible for the incremental generation and transmission costs necessary to serve
14 that load. Accordingly, resources acquired specifically to serve a Large Load customer
15 will not initially be planned as resources intended to meet the needs of the Company's
16 existing customers or to alter the Company's planned resource additions or retirements.

17 The planning considerations for resources to serve Large Load customers may
18 also differ from the Company's traditional integrated resource planning process. For
19 example, while the Company's IRP evaluates alternative resource plans with a primary
20 focus on the Net Present Value of Revenue Requirements ("NPVRR"), a Large Load
21 customer may place significant value on other considerations, particularly the speed
22 and certainty of achieving its required path to power. Because the incremental costs of
23 those resources will be assigned to one or more Large Load customers, the resource

1 selected to serve such customers will not necessarily be the resource the Company
2 would have selected to serve its existing customers through the traditional IRP process.

3 However, circumstances may arise where a resource acquired to serve one or
4 more Large Load customers has capacity available beyond Large Load customer
5 requirements. In that circumstance, the Company may evaluate whether utilizing some
6 or all of that available capacity to serve its Non-Large Load customers would provide
7 a benefit. The Company would not assign that capacity or its associated costs to existing
8 customers without first demonstrating to the Commission that doing so is prudent and
9 in the best interests of customers.

10 Any such request would also be supported by the analysis necessary to
11 demonstrate the need for and benefits of utilizing the resource for existing customers
12 and would be subject to applicable regulatory approval.

13 **Q. What considerations must Liberty evaluate when engaging in resource planning**
14 **to serve Large Load customers?**

15 A. The appropriate resource solution will depend on the specific characteristics and
16 requirements of the Large Load customer (or customers). Among other considerations,
17 the Company will evaluate the size and expected ramp of the load, the customer's
18 required/committed in-service date, the availability and timing of generation resources,
19 transmission requirements, resource adequacy requirements, and the overall cost and
20 feasibility of the available alternatives.

21 The Company will also consider each customer's specific resource preferences
22 and commercial requirements, including preferences regarding generation technology,
23 fuel type, renewable or other energy attributes, or other characteristics of the resources
24 used to serve its load. Because a Large Load customer will be responsible for the

1 incremental costs of the resources and facilities required to serve it, those customer-
2 specific requirements may appropriately influence the resource solution selected.

3 Ultimately, the objective will be to identify a viable resource solution for the
4 Large Load customer (or customers) that meets the customer's service requirements
5 while maintaining system reliability and safeguarding that the incremental costs
6 associated with serving that customer are appropriately assigned to the Large Load
7 customer and do not adversely impact existing customers.

8 **Q. How does Liberty typically procure generation to serve its customers?**

9 A. As described earlier in my testimony, Liberty generally identifies the need for new
10 generation resources through its IRP process. Once a resource need is identified and
11 the Company determines that procurement should move forward, Liberty begins the
12 process of identifying, evaluating, and negotiating for the necessary generation
13 resources.

14 For resources requiring a Certificate of Convenience and Necessity ("CCN"),
15 procurement activities generally proceed in parallel with the regulatory approval
16 process. While certain development and procurement activities may occur during that
17 period, significant commitments are typically conditioned upon receipt of the necessary
18 regulatory approvals.

19 This process provides important regulatory oversight for investments made on
20 behalf of the Company's existing customers, but the combined planning, procurement,
21 and regulatory approval process can require a significant amount of time from
22 identification of a resource need to the point at which a new resource can be placed into
23 service.

1 **Q. How does the traditional generation procurement process present challenges**
2 **when serving Large Load customers?**

3 A. As discussed above, resources acquired specifically to serve one or more Large Load
4 customers may be planned differently than resources acquired to serve the Company's
5 existing customer base. The traditional IRP process is designed to identify resources
6 that best meet the long-term needs of existing customers, while a Large Load customer
7 may place greater emphasis on considerations such as speed and certainty of achieving
8 its required path to power, resource preferences, and other customer-specific
9 requirements. Under our proposed Schedule TS-LL and Large Load program generally,
10 Large Load customers will also be responsible for the incremental costs associated with
11 the resources selected to serve them.

12 Similar considerations apply to the regulatory approval process. Missouri's
13 traditional CCN review considers a number of factors intended to evaluate whether a
14 proposed investment is appropriate for the customers who will ultimately rely upon and
15 pay for that investment. A resource developed specifically to serve one or more Large
16 Load customers presents a different circumstance. The need for the resource is created
17 by a given customer, the timing and resource requirements are driven in significant part
18 by customer service requirements, and the incremental costs and financial
19 commitments necessary to serve the load would be assigned to the given customer or
20 customers. In addition, Schedule TS-LL, Large Load customer ESAs, and other
21 applicable agreements will contain detailed financial and contractual protections
22 designed to protect Non-Large Load customers from incremental costs and risks.

23 Given these considerations, a more streamlined regulatory process should focus
24 on the considerations relevant to a resource being developed specifically for, and

1 financially supported by, a Large Load customer, including whether the proposed
2 arrangements appropriately protect existing customers. Importantly, such a process
3 would not provide a means to subsequently assign a resource or its costs to existing
4 customers without appropriate regulatory review. If the Company were to later identify
5 an opportunity for some portion of such a resource to economically and reliably meet
6 a need of its existing customers, the Company would make an appropriate regulatory
7 filing demonstrating the justification and benefits. That filing would address the need,
8 economics, customer impacts, and other regulatory considerations relevant to using the
9 resource to serve existing customers. The specific form of regulatory approval would
10 depend upon the circumstances and applicable requirements at that time.

11 Company witness Ms. Emery also discusses the potential for such a process in
12 greater detail in her direct testimony.

13 **Q. Could resources developed for Large Load customers ever provide benefits and**
14 **opportunities for the Company's existing customers?**

15 A. Yes. While the Company does not plan to acquire resources for a Large Load customer
16 with the expectation that those resources would ultimately be transferred to or
17 supported by existing customers, if circumstances independently create an opportunity
18 for available capacity from such a resource to economically meet a future need of the
19 Company's existing customers, the Company could evaluate that opportunity in the
20 same manner it would evaluate other available resource alternatives.

21 The Company would pursue such an opportunity only if it can demonstrate that
22 doing so is prudent, economically beneficial, and in the best interests of existing
23 customers. Any such proposal will be subject to appropriate regulatory review and
24 approval, including an evaluation of the need, economics, customer benefits, and other

1 considerations relevant to the use of that resource to serve existing customers. In this
2 way, considerations that may not be relevant when initially approving a resource
3 developed and funded specifically for a Large Load customer will be appropriately
4 addressed before existing customers are asked to rely upon or bear costs associated
5 with that resource.

6 The specific form of regulatory approval will depend on the circumstances and
7 applicable requirements at that time. The existence of this potential opportunity would
8 not alter Large Load customers' responsibility for the costs and commitments
9 established to serve their load.

10 **Q. How will Liberty procure generation to serve new Large Load customers?**

11 A. The specific procurement approach will depend on the specific requirements of a given
12 Large Load customer and the resource solution identified to serve its load. The
13 Company could consider a range of alternatives, including construction or acquisition
14 of new generation, power purchase agreements, capacity arrangements, or other supply
15 resources.

16 Unlike resources planned through the traditional IRP process, the procurement
17 would be tailored to the Large Load customer's specific requirements, including the
18 amount and timing of its load, required path to power, resource preferences, and other
19 commercial considerations. The Company would evaluate available alternatives and
20 pursue a resource solution that reliably meets those requirements, with the incremental
21 costs and associated commitments assigned to the Large Load customer in accordance
22 with the proposed tariff and detailed in the Large Load customer's ESA.

1 **Q. Will Large Load customers be permitted to self-supply their own generation?**

2 A. The Company is open to considering different ownership, development, and financing
3 structures for the generation necessary to serve a Large Load customer, provided those
4 arrangements comply with the proposed Schedule TS-LL, the Large Load customer's
5 ESA, and applicable regulatory and reliability requirements.

6 For example, potential structures could include Company-owned generation,
7 power purchase agreements, customer-funded facilities through pre-payments or other
8 up-front payment structures such as a contribution in aid of construction ("CIAC"), or
9 other arrangements agreed upon by the Company and the Large Load customer.
10 Regardless of the structure, any generation needed to provide service to the Large Load
11 customer will need to be appropriately integrated with the Company's system and
12 arranged through the Company to support applicable resource adequacy, operational,
13 transmission, and reliability requirements.

14 The intent is to provide flexibility in how the necessary resources are developed
15 and funded while maintaining the protection established by the tariff for the Company
16 and its existing customers.

17 **III. CAPACITY SUPPORT CHARGE**

18 **Q. At a high level, why is it appropriate that Large Load customers contribute**
19 **toward the Company's existing generation system even where they are responsible**
20 **for funding incremental generation resources?**

21 A. Liberty's proposal is built on a balanced rate-design principle: Large Load customers
22 should be responsible for the incremental costs necessary to serve their load while
23 making a reasonable contribution toward the existing electric system that supports their
24 service.

1 Schedule TS-LL therefore does not treat Large Load customers the same as
2 traditional customers whose generation needs are served through Liberty's existing
3 generation fleet. At the same time, it also does not treat Large Load customers as
4 isolated from the broader bulk electric system. The tariff reflects that Large Load
5 customers will receive network service from an integrated electric system and should
6 contribute to that system in a manner that is reasonable, measurable, and protective of
7 existing customers.

8 **Q. Please describe in more detail the Capacity Support Charge included in Schedule**
9 **TS-LL.**

10 A. The Capacity Support Charge is the component of Schedule TS-LL that reflects the
11 Large Load customer's contribution to Liberty's existing generation system. It is
12 separate from the Incremental Generation and Transmission Charge, which is designed
13 to recover the costs of new generation, transmission, and related facilities required
14 specifically to serve the Large Load customer.

15 The Capacity Support Charge recognizes that, even where a Large Load
16 customer is served through dedicated or incremental resources, the customer still
17 receives service as part of Liberty's integrated electric system. As a network customer,
18 the Large Load customer benefits from the system's existing infrastructure, resource
19 diversity, operational flexibility, and reliability support, including the ability to
20 continue receiving service when a dedicated or incremental resource is unavailable.
21 The charge reflects a reasonable contribution toward that existing system without
22 shifting the customer's incremental generation and transmission costs to existing
23 customers.

1 **Q. Why does Schedule TS-LL include a Capacity Support Charge if the Large Load**
2 **customer is already responsible for the incremental generation required to serve**
3 **its load?**

4 A. The Capacity Support Charge recognizes the unique position of a Large Load customer
5 under our proposed Schedule TS-LL. On one hand, Large Load customers will be
6 responsible for 100% of the incremental generation and transmission costs necessary
7 to serve their load. Accordingly, it is not appropriate to simply charge the customer the
8 full embedded cost of existing generation as though those resources were being relied
9 upon to meet the customer's incremental generation requirement.

10 On the other hand, Large Load customers will not be served by an isolated set
11 of resources. They will receive service as part of the Company's broader network
12 system and will benefit from the reliability, operational flexibility, and system support
13 provided by the existing generation fleet. The Company therefore maintains it is
14 reasonable for Large Load customers to make a meaningful contribution toward the
15 fixed costs of the existing generation system.

16 The Capacity Support Charge is intended to balance those considerations. It is
17 designed to produce a meaningful and measurable benefit for existing customers after
18 the incremental costs and risks associated with serving Large Load customers have first
19 been assigned to those customers. At the same time, the charge recognizes that a given
20 Large Load customer is separately funding the incremental resources required to meet
21 its additional generation needs and therefore should not be treated as though its full
22 generation requirement is being supplied by the existing generation fleet.

23 The proposed level of the Capacity Support Charge reflects a rate-design
24 judgment intended to balance cost causation, the benefits the Large Load customer

1 receives from the integrated system, protection of existing customers, and avoidance
2 of duplicative generation cost recovery.

3 **Q. How will the Company determine the level of the Capacity Support Charge?**

4 A. The Company approached the Capacity Support Charge as a rate-design determination
5 rather than an allocation of the full embedded cost of existing generation. Our objective
6 is to establish a charge that provides a meaningful contribution toward existing fixed
7 generation costs while recognizing that a given Large Load customer is separately
8 responsible for the full incremental generation costs necessary to serve its load.

9 The proposed charge of 35% of the otherwise applicable Existing Generation
10 Demand Charge strikes that balance. It provides a material contribution toward costs
11 that would otherwise continue to be recovered from existing customers, while avoiding
12 a structure that would require the Large Load customer to pay the full embedded
13 generation charge in addition to directly funding the incremental generation required
14 for its service.

15 The Company also considered the commercial viability of the resulting rate.
16 Commercial viability is important not simply for the benefit of Large Load customers,
17 but because existing customers cannot realize the benefits of additional fixed-cost
18 contributions from Large Load customers if the overall rate structure is not competitive
19 enough to attract the new load in the first place.

20 **IV. LIBERTY'S LARGE LOAD INTERCONNECTION PROCESS**

21 **Q. Can you please describe Liberty's procedures for interconnecting Large Loads?**

22 A. Under Liberty's former Interconnection Queue Process for Missouri Large Load
23 Customers, any new or existing customer with a demand of 10 MW or greater was
24 required to file an application to interconnect with Liberty's system at a single common

1 point of interconnection. These procedures also explicitly referenced and incorporated
2 the planning processes and criteria set out by SPP whereby they evaluated the impact
3 of new or modified Large Load connections on the bulk electric system.

4 At a high level, this load interconnection process included four discrete phases
5 in addition to a pre-application consultation between Liberty and the applicant. During
6 the pre-application consultation, the applicant and Liberty would discuss the scope of
7 the applicant's intended project (particularly the size, phasing, timeline, and location),
8 any high-level system capacity restraints, data requirements, the SPP interconnection
9 study process, and any other applicable legal and regulatory requirements.

10 After this initial discussion, the applicant would move to Phase I, the
11 application submittal. At this stage, the applicant was required to submit a formal
12 application including all required elements (*e.g.*, a detailed project description, site
13 plans, energy supply plans, preliminary financial information), as well as a non-
14 refundable application fee and study deposit. Once the application was submitted,
15 Liberty would then conduct a completeness review. After Liberty determined that the
16 application was complete, the applicant would move on to Phase II of the process where
17 Liberty would assign the applicant a position in the interconnection queue (based on
18 the date the application was deemed complete), Liberty and the applicant would engage
19 in a scoping meeting about the project, and Liberty would perform the required studies
20 under applicable SPP requirements.

21 Once the required studies had been completed, Liberty would provide the
22 results to the applicant in Phase III. The applicant would then review the results and
23 inform Liberty whether it wished to proceed with its interconnection request, withdraw
24 its request, or request supplemental studies. If the applicant requested supplemental

1 studies, those studies would be performed. If the applicant decided to proceed with its
2 interconnection request, Liberty and the applicant would then negotiate the terms of the
3 agreements necessary to carry out the project.

4 After the agreements were finalized, Liberty and the applicant would move into
5 Phase IV, the implementation phase. At this stage, Liberty and the applicant would
6 undertake detailed designs, procure equipment, and begin construction of the necessary
7 facilities. Once construction was complete the facilities would undergo rigorous testing
8 to support a finding of no adverse impact on Liberty's system. Finally, after the testing
9 requirements and terms of the agreements had been satisfied, Liberty would grant
10 permission for the applicant's facilities to begin commercial operation.

11 **Q. Has Liberty recently updated this process to better account for Large Load**
12 **customers?**

13 A. Yes, Liberty recently updated its Large Load customer interconnection policy.³ While
14 much of the process remains consistent with the former process, Liberty has moved
15 from a pure "first-come, first-served" interconnection process to a "first-ready, first-
16 served" process. Under this framework, an applicant will be considered "ready" when
17 it has completed all required studies, accepted the results of those studies, committed
18 to required network upgrades, executed all applicable interconnection agreements,
19 satisfied applicable financial security requirements, obtained all material regulatory
20 requirements, and accepted the terms of the applicable tariff and ESA. As explained
21 above, under our existing (and updated) load interconnection process framework,
22 applicants are assigned a queue position according to the date on which Liberty deems

³ The updated policy is available on Liberty's website. See <https://central.libertyutilities.com/all/large-load-customer-requests.html>

1 their interconnection application complete. Under the revised Large Load customer
2 interconnection framework, which was developed in parallel with Schedule TS-LL, the
3 queue position for Large Load customer applicants will continue to reflect the date that
4 Liberty deems the application complete, but this queue position, on its own, will not
5 establish interconnection priority, a right to service, or precedence over other applicants
6 in the queue.

7 **Q. Why did Liberty decide to modify the interconnection process for its Large Load**
8 **customers to a “first ready, first served” framework?**

9 A. There are several reasons why this approach is appropriate for service to Large Load
10 customers, largely as a result of the size of such customers relative to Liberty. Even a
11 single Large Load customer could constitute a substantial percentage of total system
12 load, meaning that Liberty must be cautious about how requests for interconnection by
13 Large Load customers are studied and advanced to the interconnection phase. The “first
14 ready” approach will enable Liberty to prioritize projects that have demonstrated
15 sufficient maturity to proceed, while reducing the likelihood that undeveloped or
16 premature proposals occupy limited queue capacity.

17 **Q. Does Liberty have any prospective Large Load customers in its interconnection**
18 **queue?**

19 A. Yes, there are currently two prospective customers in Liberty’s interconnection queue
20 that would fall under Liberty’s proposed Schedule TS-LL.

21 **Q. What is the status of those two Large Load customers?**

22 A. Applications for interconnection are complete for both customers; one as an SPP
23 Attachment AQ and one as an SPP Attachment AX.

1 **Q. Is Liberty in discussions with other potential Large Load customers?**

2 A. Yes, Liberty has received inquiries from other potential Large Load customers who are
3 interested in locating in our service territory. We anticipate, that approval of our Large
4 Load customer tariff and overall program will enhance our ability to move forward
5 more efficiently with prospective customers.

6 **Q. Does Liberty anticipate that its queue of Large Load customers will grow in the**
7 **coming years?**

8 A. Yes, we expect that as a result of the national trends driving Large Load growth
9 nationwide and state policies for economic development, as discussed in more detail in
10 the direct testimony of Company witness Ms. Emery, will continue to draw interest in
11 Missouri by prospective Large Load customers, and that some amount of that interest
12 will come to Liberty's service territory. Further, having a Large Load customer tariff
13 in place that provides a clear structure for service and provides increased certainty to
14 such customers as to expected costs and terms of service may increase the likelihood
15 that Large Load customers seek to locate in our service territory.

16 **V. CONCLUSION**

17 **Q. Does this conclude your direct testimony?**

18 A. Yes.

VERIFICATION

I, Aaron J. Doll, under penalty of perjury, on this 11th day of September, 2026, declare that the foregoing is true and correct to the best of my knowledge and belief.

/s/ Aaron J. Doll