BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Clarification of PPA Replacement Values for The Empire District Electric Company's d/b/a Liberty's Market Price Protection Mechanism	))))	**File No. EO-2026-0101**

JOINT PROPOSED LIST OF ISSUES, ORDER OF WITNESSES, AND ORDER OF CROSS-EXAMINATION

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through the undersigned counsel, on behalf of Staff, The Empire District Electric Company d/b/a Liberty ("Liberty" or "Company"), the Office of the Public Counsel ("OPC"), and Midwest Energy Consumers Group ("MECG"), and respectfully submits this Joint Proposed List of Issues, Order of Witnesses, and Order of Cross-Examination pursuant to the Commission's April 28, 2026 Order Establishing Procedural Schedule:

1. The Parties do not necessarily agree with the wording of some issues or inclusion of all of the issues set out herein. The inclusion of an issue and a Party's position thereon in the list below does not mean all Parties agree with such issue's characterization, that such issue identified is actually in dispute, and/or that a Commission decision on such issue is proper or necessary in this case.

LIST OF ISSUES

2. The Commission opened this case to address purchased power agreement ("PPA") replacement values in Liberty's Market Price Protection Mechanism ("MPPM").[1]

[1] *Order Opening Case, Directing Notice, Establishing Time to Intervene, and Scheduling a Procedural Conference*, File No. EO-2026-0101.

Staff and OPC's proposed issue:

1. What did the Commission mean by the term "PPA Replacement Value = value associated with replacing the existing wind PPAs during the period of the guarantee, as shown on Exhibit C (row 15 excel)" in the Market Price Protection Mechanism ("MPPM") when it ordered that the MPPM be implemented?

Company's proposed issues:

1. What did the Commission mean by the term "PPA Replacement Value = value associated with replacing the existing wind PPAs during the period of the guarantee, as shown on Exhibit C (row 15 excel)" in the Market Price Protection Mechanism ("MPPM") when it ordered that the MPPM be implemented, and as further clarified by the Commission in ER-2021-0312?

2. Are Transmission Congestion Rights ("TCR") and Auction Revenue Rights ("ARR") revenues included in the revenue component of the MPPM calculation?

ORDER OF WITNESSES

Liberty Witness:

Aaron J. Doll

Staff Witness:

J Luebbert

Public Counsel Witnesses:

Manzell M. Payne

Geoff Marke

ORDER OF CROSS EXAMINATION

The proposed order below does not state that a party intends to cross-examine or has waived cross-examination.

Liberty Witness: Influent Energy; Empire District Retired Members & Spouses Association, LLC; IBEW Local Union 1474; Renew Missouri; Consumers Council of Missouri; Midwest Energy Consumers Group; Staff; Office of the Public Counsel.

Staff Witness: Influent Energy; Empire District Retired Members & Spouses Association, LLC; IBEW Local Union 1474; Renew Missouri; Consumers Council of Missouri; Midwest Energy Consumers Group; Office of the Public Counsel; Liberty.

Public Counsel Witnesses: Influent Energy; Empire District Retired Members & Spouses Association, LLC; IBEW Local Union 1474; Renew Missouri; Consumers Council of Missouri; Midwest Energy Consumers Group; Staff; Liberty.

3. Staff contacted the parties regarding this filing. Liberty, OPC, and MECG were the only parties to respond at the time of this filing.[2] Staff submits this filing on behalf of Staff, Liberty, and the OPC.

Respectfully submitted,

/s/ Eric Vandergriff
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Staff Counsel for the
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or electronically mailed to all parties and/or counsel of record on this 12th day of November 2026.

/s/ Eric Vandergriff

[2] Microsoft Outlook became unavailable at approximately noon on November 12, 2026. Staff was unable to receive emails from that time until this filing.