



The Empire District Electric Company d/b/a Liberty  
Case No. ER-2024-0261  
Office Public Counsel Data Request - 8009.3

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Data Request Received: 2025-04-08

Response Date: 2025-04-28

Request No. 8009.3

Witness/Respondent: Todd Tarter

Submitted by: Lena Mantle, lena.mantle@opc.mo.gov

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**REQUEST:**

Please provide a list items of the Fuel Model were developed by Liberty subject matter experts. Identify for each item (1) the direct testimony (witness and testimony page) that describes the development of each item and (2) the workpaper provided with the direct testimony including a site to where in the workpapers the item was developed. If workpapers that show how an item was developed were not provided with direct testimony, please provide the workpaper that shows the development of each item.

**RESPONSE:**     **ATTACHMENTS CONFIDENTIAL PURSUANT TO 20 CSR 4240-2.135(2)(A)3**

**Net Metering Credits**

1. Tarter direct testimony – page 8 mentions the inclusion of this component in the FAC base factor. Details are provided in the workpapers, consistent with past rate cases.
2. “Workpaper - TWT Schedules (1.20.25) - Confidential.xlsx” includes the historical data for this component on tab “NM Credits”.

**Natural Gas Transportation**

1. Tarter direct testimony – page 11 mentions the exclusion of this component in the FAC base factor. Details are provided in the workpapers, consistent with past rate cases.
2. “Workpaper - TWT Schedules (1.20.25) - Confidential.xlsx” includes the contract information for this component on tab “Natural Gas Transport”.

### **ARR/TCR Revenue**

1. Tarter direct testimony – page 8 mentions the inclusion of this component in the FAC base factor. Details are provided in the workpapers, consistent with past rate cases.
2. “Workpaper - TWT Schedules (1.20.25) - Confidential.xlsx” includes the summary data for this component on tab “ARR TCR”, the details and historical data can be found in the included “2024 MO Rate Case ARR TCR Offset – Confidential.xlsx” workpaper.

### **Undistributed and Other**

1. Tarter direct testimony – page 7 mentions the inclusion of this component in the FAC base factor. Details are provided in the workpapers, consistent with past rate cases.
2. “Workpaper - TWT Schedules (1.20.25) - Confidential.xlsx” includes the summary data for this component on tab “Undist Other”, the details and historical data can be found in the included “2024 MO Rate Case Undistributed and Other – Confidential.xlsx” workpaper.

### **Consumables**

1. Tarter direct testimony – page 8 mentions the inclusion of this component in the FAC base factor. Details are provided in the workpapers, consistent with past rate cases.
2. “Workpaper - TWT Schedules (1.20.25) - Confidential.xlsx” includes the historical data for this component on tab “Consumables”.

### **Renewable Energy Credits**

1. Tarter direct testimony – page 8 mentions the inclusion of this component in the FAC base factor. Details are provided in the workpapers, consistent with past rate cases.
2. “Workpaper - TWT Schedules (1.20.25) - Confidential.xlsx” includes the calculations for this component on tab “RECs”.

### **Ancillary and Other**

1. Tarter direct testimony – page 8 mentions the inclusion of this component in the FAC base factor. Details are provided in the workpapers, consistent with past rate cases.
2. “Workpaper - TWT Schedules (1.20.25) - Confidential.xlsx” includes the historical data for this component on tab “AncillaryOther”.

### **Fuel Administration**

1. Tarter direct testimony – page 8 mentions the inclusion of this component in the FAC base factor. Details are provided in the workpapers, consistent with past rate cases.
2. “Workpaper - TWT Schedules (1.20.25) - Confidential.xlsx” includes the historical data for this component on tab “Fuel Admin”.

### **Transmission**

1. Tarter direct testimony – page 4 mentions the inclusion of this component in the FAC base factor and points to Company witness Doll’s testimony for details.
2. “Workpaper - TWT Schedules (1.20.25) - Confidential.xlsx” includes the summary data for this component on tab “Transmission.” The details can be found in the included “2024 MO Rate Case Transmission – Confidential.xlsm” workpaper.

The workpapers included are designated Confidential as they contain sensitive company information including contract information and information related to the Company’s transmission hedging in the SPP Integrated Marketplace.