

Exhibit No. 227



The Empire District Electric Company d/b/a Liberty

Case No. ER-2024-0261

Office Public Counsel Data Request - 2001

Data Request Received: 2025-09-17

Response Date: 2025-09-23

Request No. 2001

Witness/Respondent: Colin Penny

Submitted by: Geoff Marke, Geoff.Marke@opc.mo.gov

REQUEST:

Please provide a copy of each and every analysis submitted with Empire's rate case application to the Commission as a condition of the stipulation and agreement filed in Case No. EM-2016-0123 related to the following provision or that has otherwise been filed with or submitted to the Missouri Commission:

Ratepayer Protections:

In the first rate case after Empire implements a new customer information system and/or billing system, Empire will support the costs of the new system by submitting a "business case," with its application. The business case will, among other things, (1) demonstrate Empire's need for a new system and the impact of the merger on this need, (2) demonstrate Empire's analysis resulting in the selection of the new system implemented, (3) describe and quantify the costs associated with the selected system, and (4) describe the impact on rates of the cost of the new and the retiring systems, including the treatment of any remaining undepreciated balances and changes to the useful lives of the systems.¹⁰

If no such copy or analysis was submitted or filed please explain why it was not.

RESPONSE:

In response to the request for each and every analysis submitted with Empire's rate case application to the Commission as a condition of the stipulation and agreement filed in Case No. EM-2016-0123, please note that Colin's direct testimony was specifically prepared and submitted to fulfill this requirement. His testimony addresses the provision in question and includes the relevant analyses that were either filed with or submitted to the Missouri Commission in connection with Empire's rate case. More specifically, see below:

For (1), please refer to Colin Penny's direct testimony, pages 3-4.

For (2), please refer to Colin Penny's direct testimony, page 4.

For (3), please refer to Colin Penny's direct testimony, pages 9-10.

For (4), please refer to Colin Penny's direct testimony, pages 9-10.