

CONFIDENTIAL DESIGNATIONS

The Empire District Electric Company d/b/a Liberty

EA-2025-0299

RE: Confidential Portions of Shaen T. Rooney's Confidential Supplemental Direct Testimony

The information provided is designated "Confidential" in accordance with Commission Rule 20 CSR 4240-2.135(2)(A)3, 5 and 6 as it contains marketing analysis or other market specific information related to services offered in competition with others. The confidentiality shall be maintained consistent with that Rule and/or Section 386.480 RSMo, as the case may be.

Exhibit No.: _____
Issues: Project Update
Witness: Shaen T. Rooney
Type of Exhibit: Supplemental Direct
Testimony
Sponsoring Party: The Empire District
Electric Company d/b/a Liberty
Case No.: EA-2025-0299
Date Testimony Prepared: March 2026

**Before the Public Service Commission
of the State of Missouri**

Supplemental Direct Testimony

of

Shaen T. Rooney

on behalf of

The Empire District Electric Company d/b/a Liberty

March 12, 2026



****DENOTES CONFIDENTIAL****
20 CSR 4240-2.135(2)(A)3, 5 and 6

PUBLIC VERSION

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THE EMPIRE DISTRICT ELECTRIC COMPANY D/B/A LIBERTY
BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION
CASE NO. EA-2025-0299

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SUPPLEMENTAL DIRECT TESTIMONY OF SHAEN T. ROONEY
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 Shaen T. Rooney, and my business address is 602 South Joplin Avenue,
4 Joplin, Missouri, 64801.

5 **Q. Are you the same Shaen T. Rooney that filed direct testimony in this case?**

6 A. Yes. My direct testimony on behalf of The Empire District Electric Company d/b/a
7 Liberty (“Liberty” or the “Company”) was filed on October 24, 2025.

8 **Q. What is the purpose of this supplemental direct testimony?**

9 A. The purpose of this supplemental testimony is to further support the Company’s request
10 for a Certificate of Convenience and Necessity (“CCN”) by explaining the necessity,
11 timing, and prudence of the ERAS 250 MW simple-cycle combustion turbine project
12 (“the Project”). This testimony provides updated information regarding procurement,
13 project execution strategy, and cost impacts that bear directly on the Project’s necessity
14 and convenience for the public. As described in my initial testimony and below, the
15 Project is required to meet the accredited capacity need identified in the Company’s
16 2025 Integrated Resource Plan (“IRP”) and to achieve commercial operation by the
17 ERAS deadline of October 2, 2030, in order to maintain its accelerated interconnection
18 rights. Absent timely completion of the Project, the Company would be required to
19 pursue alternative resources to meet its resource adequacy obligations, potentially
20 including emergency procurement from an independent power producer or another
21 load-serving entity.

1 **Q. Portions of your supplemental direct testimony are designated confidential. Please**
2 **explain the basis for this.**

3 A. It is appropriate to designate portions of my supplemental direct testimony confidential
4 because they contain nonpublic, market-specific information concerning equipment
5 and services the Company is seeking to acquire for use in serving customers, as well
6 as strategies employed and under consideration in ongoing contract negotiations, and
7 other competitively sensitive commercial information. More specifically, my testimony
8 discusses matters such as ** [REDACTED]

9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]

19 [REDACTED]**

20 **Q. Please further explain the purpose of your supplemental direct testimony.**

21 A. This supplemental testimony provides additional information to support the
22 Commission's consideration of the Project by describing the Company's extensive
23 efforts ** [REDACTED]

24 [REDACTED]

1 [REDACTED]
2 [REDACTED].** This
3 testimony also summarizes updates to the Project budget, explains the primary drivers
4 of cost changes, and requests that the Commission establish the Project costs and
5 timeline for consideration in a future proceeding addressing Construction Work In
6 Process (“CWIP”).

7 **II. BACKGROUND AND NEED FOR THE PROJECT**

8 **Q. Why is Liberty pursuing the Project?**

9 A. Liberty is pursuing the Project to meet a clear and growing accredited capacity need
10 identified in the Company’s 2025 IRP. As part of the IRP, Liberty evaluated twelve
11 resource portfolios using a structured analytical process that included feasibility
12 screening, cost screening, and portfolio optimization. That analysis determined that an
13 approximately 240 MW simple-cycle combustion turbine represents the least-cost
14 feasible resource capable of meeting the Company’s reliability, accredited capacity,
15 and compliance obligations to customers. Other alternatives evaluated in the IRP either
16 failed feasibility screening, could not be delivered within the required timeframe, or
17 would have imposed materially higher long-term costs or increased reliability risks for
18 customers.

19 **Q. Why is the timing of the Project critical?**

20 A. The timing of the Project is driven by two interrelated factors that together create a firm
21 deadline. First, the ERAS framework requires any generator subject to that study to
22 achieve commercial operation no later than October 2, 2030. Second, Southwest Power
23 Pool’s (“SPP”s) tightening accredited capacity and winter reserve margin requirements
24 indicate that the Company’s capacity need emerges in the 2030–2031 winter period.

1 Q. Did that review identify any significant risks?

2 A. ** [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

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[REDACTED]

[REDACTED] **

Q. How did the seller respond to Liberty's redlines of these items?

A. ** [REDACTED]

[REDACTED] **

Q. How did the Company respond to this reaction from the seller?

A. ** [REDACTED]

[REDACTED] **

Q. Was this successful?

A. ** [REDACTED]

[REDACTED] **

Q. Have pricing and/or delivery dates for equipment been impacted by the delay in signing a reservation agreement?

1 A. **

[REDACTED]

2

3

4

5

6

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8

9

[REDACTED]**

10 Q. How did the Company respond to these challenges?

11 A. **

[REDACTED]

12

13

14

15

[REDACTED]**

16 Q. What was the outcome of that outreach?

17 A. **

[REDACTED]

18

19

20

21

22

[REDACTED]**

1 **IV. EXECUTION STRATEGY AND CONTRACTOR ALIGNMENT**

2 **Q. How does this execution strategy benefit the Project?**

3 A. ** [REDACTED]

9 [REDACTED] **

10 **Q. What steps are underway to finalize the execution structure?**

11 A. ** [REDACTED]

15 [REDACTED] **

16 **V. GOVERNANCE, STAGE GATED COMMITMENTS, AND RISK**
17 **MITIGATION**

18 **Q. Has the estimate for completion of the Project been impacted by the delay in**
19 **securing turbine supply?**

20 A. Yes. The Project budget has been updated to reflect current market conditions and the
21 impacts associated with securing turbine supply. The original estimate for the Project
22 was approximately ** [REDACTED] ** which excluded overheads and Allowance for
23 Funds Used During Construction (“AFUDC”), and equates to roughly ** [REDACTED]
24 [REDACTED] ** based on an approximately 240-MW unit. The updated total Project budget is

1 now approximately [REDACTED]**, inclusive of overheads and AFUDC, which
2 corresponds to approximately ** [REDACTED] ** per kW.

3 **Q. What accounts for this increase?**

4 A. Although the Project budget has increased by ** [REDACTED] **, the estimate to
5 complete the Project has increased by ** [REDACTED] ** or approximately ** [REDACTED] **
6 per kW. The remaining ** [REDACTED] ** or approximately ** [REDACTED] ** per kW, reflects
7 a contingency associated with a selective catalytic reduction system that would be
8 required only if imposed by the Missouri Department of Natural Resources, through
9 the air emission source construction permit. Of the ** [REDACTED] ** increase in the
10 estimate to complete the Project, approximately ** [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]**

14 **Q. Does the Company intend to request CWIP recovery for the generating unit that**
15 **is the subject of this proceeding?**

16 A. Yes, the Company is requesting that the Commission establish the Project costs and
17 timeline for purposes of potential consideration of CWIP recovery in a future rate
18 proceeding under Section 393.135, subject to Commission review and approval at that
19 time. The cost information provided in this supplemental testimony reflects the level
20 of Project spending approved by Company management for execution of the Project
21 through completion.

22 **Q. How does the Company provide for prudent decision making as the project**
23 **advances?**

1 A. One of the core governance principles for the ERAS project is stage gated commitment.
2 Each material spend decision is tied to a specific milestone—internal approvals, CCN
3 approval, interconnection certainty, and commercial terms that fairly allocate risk. This
4 approach allows us to move at market speed while protecting customers from
5 premature or irreversible commitments while still allowing the Company to respond to
6 market realities.

7 **VI. ALIGNMENT WITH IRP AND CUSTOMER BENEFITS**

8 **Q. How does the Project align with the IRP?**

9 A. The Project is the execution of the Company’s preferred IRP portfolio. It is the least
10 cost option that meets reliability and compliance constraints, which are core obligations
11 of a regulated utility. Approval of the Project therefore represents execution of a
12 Commission-reviewed planning process rather than a departure from it.

13 **VII. CONCLUSION**

14 **Q. Does this conclude your supplemental direct testimony at this time?**

15 A. Yes.

VERIFICATION

I, Shaen T. Rooney, under penalty of perjury, on this 12th day of March, 2026, declare that the foregoing is true and correct to the best of my knowledge and belief.

/s/ Shaen T. Rooney