BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the 2026 Annual Update Filing of	)	
The Empire District Electric Company d/b/a Liberty	)	**EO-2026-0230**
Pursuant to Commission Rule 20 CSR 4240-22.080(3)	)	

Comments of Renew Missouri

COMES NOW Renew Missouri Advocates d/b/a Renew Missouri submits these comments on The Empire District Electric Company d/b/a Liberty ("Liberty") 2026 Integrated Resource Plan ("IRP") Annual Update filing.

The below comments were prepared by Renew Missouri and reflect our organization's reactions to and opinions on the Company's most recent IRP Report and materials.

All communications and inquiries regarding the below comments, and any other communications to Renew Missouri relevant to this case, should be directed to the following individuals:

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Renew Missouri appreciates the opportunity to share these comments and welcomes further discussion.

I. Introduction

Liberty's 2026 IRP Annual Update appropriately recognizes the significant changes occurring within the Southwest Power Pool ("SPP") resource adequacy framework, including implementation of seasonal accreditation methodologies, higher winter planning reserve margins, and the Expedited Resource Adequacy Study ("ERAS") process. However, the Company's response places disproportionate emphasis on fossil fuel generation while prematurely abandoning demand-side management ("DSM") and renewable resource development.

II. Removal of Demand-Side Management Resources

One of the most concerning aspects of Liberty's updated preferred plan is the complete removal of DSM resources following withdrawal of the Company's Missouri Energy Efficiency Investment Act ("MEEIA") Cycle 2 application.[1] Demand-side resources remain among the most cost-effective tools available for addressing capacity needs, reducing customer costs, mitigating fuel price exposure, and improving overall system reliability. Rather than removing DSM entirely from the preferred plan, Liberty should continue evaluating revised energy efficiency portfolios, winter-peaking demand response programs, targeted electrification management strategies, and distributed customer programs that incorporate solar and battery storage. Renew Missouri suggests modeling smaller scale portfolios of DSM measures, including scenarios in which energy efficiency and demand-response measures are offered outside of MEEIA.

III. Removal of Utility-Scale Solar Resources

[1] Liberty Utilities. 2026 IRP Annual Update, File No. EO-2026-0230.

Liberty's updated preferred plan also removes the previously planned 175 MW utility-scale solar project from the 2028 timeframe.[2] While seasonal accreditation reforms may reduce the winter capacity value assigned to standalone solar resources, lower winter accreditation does not eliminate the operational and economic value of renewable generation. Liberty should continue evaluating solar-plus-storage projects and hybrid renewable configurations capable of improving reliability contributions under SPP's updated accreditation framework. Renew Missouri suggests modeling utility-scale solar, paired with different storage options, as scenarios for meeting Liberty's resource needs in the fast-approaching 2028 timeframe.

IV. Overreliance on Natural Gas Generation

The updated preferred plan substantially increases reliance on new gas-fired generation resources including new combustion turbines at Riverton, a proposed 240 MW F-class combustion turbine at the State Line Power Station, and expanded distributed RICE generation later in the planning horizon.[3] Although these resources may provide accredited winter capacity value under current SPP rules, the filing understates the long-term risks associated with expanded dependence on fossil fuel infrastructure. Liberty itself acknowledges uncertainty surrounding future greenhouse gas regulation and future emissions compliance obligations applicable to fossil-fueled resources.[4] Renew Missouri suggests modeling natural gas generation paired with battery storage to provide stakeholders with information on if planned natural gas capacity can be reduced or replaced. Additionally, this would provide stakeholders insight into risk reduction in fuel

[2] Id.
[3] Id.
[4] Id.

costs, price volatility, and compliance obligations potentially achieved by pairing gas and battery storage.

V. Transmission Expansion Supports Renewable Integration

Expanded regional transmission capability strengthens the case for renewable integration rather than weakening it. Broader transmission access improves geographic diversity of renewable resources, reduces renewable curtailment risk, enhances system flexibility, and lowers congestion costs across the SPP footprint. Renew Missouri suggests Liberty continue to evaluate transmission upgrades to expand capacity, as well as regional transmission projects that may offer opportunities to off-take energy as an alternative to generation buildout.

VI. Conclusion

Liberty's updated preferred plan appropriately recognizes evolving reliability requirements within SPP. However, the Company's response relies too heavily on new fossil fuel infrastructure while abandoning cost-effective demand-side and renewable resource opportunities. The Commission should encourage Liberty to continue to evaluate diversified clean energy and demand-side program alternatives that can meet SPP's reliability requirements.