

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter the Application of The Empire )  
District Gas Company d/b/a Liberty for a )  
Certificate of Convenience and Necessity to ) **File No. GA-2023-0110**  
Construct, Install, Own, Operate, Maintain, )  
and Otherwise Control and Manage a Natural )  
Gas Distribution System in and Around Platte )  
County, Missouri as an Expansion of its )  
Existing Certified Areas )

**MOTION FOR EXTENSION OF TIME  
TO FILE STAFF RECOMMENDATION**

**COMES NOW**, the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and for its *Motion for Extension of Time to File Staff Recommendation*, states as follows:

1. On September 21, 2022, The Empire District Gas Company d/b/a Liberty (hereafter “EDG” or “the Company”) filed an application requesting a Certificate of Convenience and Necessity (CCN) to construct, install, own, operate, maintain, and otherwise control and manage a natural gas distribution system to provide natural gas service in and around Platte County, Missouri as a further expansion of its existing certified area, and Request for Waiver from the notice provisions of Commission Rule 20 CSR 4240.4.017(1).

2. On September 22, 2022, the Commission issued an *Order and Notice*. In its *Order*, the Commission directed notice of the application and set a deadline for interested parties to intervene. The Commission received no intervention requests.

3. On October 11, 2022, the Commission issued an *Order Directing Filing*. In its *Order*, the Commission directed Staff to file a recommendation regarding the Company’s application no later than November 10, 2022.

4. Staff has and will continue to issue data requests to aid in its review, provide feedback, and continue discussions with EDG. However, EDG's responses to Staff's initial rounds of data requests have spurred the need for further investigation and additional discovery.

5. Further, as is common practice in cases regarding the expansion of existing natural gas distribution systems, Staff requests additional time to review the information provided thus far and determine if further information is needed.

6. In order to provide sufficient time to conduct further discovery, analyze newly acquired data and information from EDG, and complete its investigation, Staff requests an additional 60 days in which to complete and file its recommendation. That being said, Staff will endeavor to complete its review prior to any newly-established filing date.

7. Counsel for EDG and the Office of the Public Counsel have been contacted regarding this motion and neither party objects to the granting of an extension of time in this matter.

8. This motion is made in the interest of justice and without the intent to unreasonably delay or hinder these proceedings in any manner.

**WHEREFORE**, Staff respectfully submits this *Motion for Extension of Time to File Staff Recommendation* for the Commission's information and consideration and prays the Commission grant Staff an additional 60 days within which to file its recommendation in this matter; and to grant such other and further relief as the Commission considers just and reasonable in the circumstances.

Respectfully submitted,

**/s/ Carolyn H. Kerr**

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Missouri Public Service Commission

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 10th day of November, 2022, to all counsel of record.

**/s/ Carolyn H. Kerr**