

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

In the Matter of the Application of The)
Empire District Gas Company d/b/a Liberty)
for an Order Granting a Variance from 20) **Case No. GE-2023-0196**
CSR 4240-10.030(19) to Revise its Meter)
Testing Plan)

STAFF REQUEST FOR ADDITIONAL TIME

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”) and for its *Staff Request for Additional Time*, states as follows:

1. On December 13, 2022, The Empire District Gas Company d/b/a Liberty (“EDG”) filed an application with the Commission seeking a variance of the requirement to implement a new Sample Meter Testing Plan in lieu of any meter testing plans currently in place. Specifically, EDG requests waiver of 20 CSR 4240-10.030(19).

2. On December 15, 2022, the Commission issued an order setting an intervention application deadline of January 13, 2023, and directed Staff to file either a request for additional time or a recommendation by no later than February 17, 2023. No applications to intervene have been filed.

3. Staff has begun its review of EDG’s request, has submitted initial and follow up data requests, and continues to review EDG’s data request responses while awaiting responses to outstanding data requests.

4. Staff needs additional time to continue its review, receive responses to outstanding data requests and draft its recommendation. Staff anticipates that it will have completed its discovery and analysis and will be able to file its recommendation no later than April 25, 2023.

WHEREFORE, Staff respectfully requests the Commission accept this *Staff Request for Additional Time* and permit Staff to file its recommendation no later than April 25, 2023; and grant such other and further relief as the Commission considers reasonable in the circumstances.

Respectfully submitted,

/s/ Jamie S. Myers
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile, or electronically mailed to all parties and/or counsel of record on this 17th day of February, 2023.

/s/ Jamie S. Myers