# 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 CSR 4240- ) 10.030(19) to Revise its Meter Testing Plan )

Case No. GE-2023-0196

### **MOTION FOR ONE-DAY EXTENSION**

**COMES NOW** the Staff of the Missouri Public Service Commission ("Staff"), through counsel, and for its Motion for One-Day Extension, respectfully states as follows:

1. On December 13, 2022, EDG filed an *Application for Variance and Request for Waiver* ("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.

2. On December 15, 2022, the Commission ordered Staff to either file a recommendation or a request for additional time no later than February 17, 2023.

3. On February 17, 2023, Staff filed its *Request for Additional Time*. On February 28, 2023, the Commission granted Staff's *Request for Additional Time* and ordered Staff to submit its recommendation, or request an additional extension, on or before April 25, 2023.

4. In response to information requests from Staff, EDG filed a *Notice of Amended Proposal* ("Notice") on March 10, 2023. In its Notice, EDG included an amended and corrected Sample Meter Testing Plan.

5. During Staff's review of EDG's Application and internal discussion, several issues arose. In order to adequately address these issues, Staff respectfully requests a one-day extension to file its recommendation.

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WHEREFORE, Staff prays that the Commission will grant this Motion for One-Day Extension, and order Staff to file its Recommendation no later than April 26, 2023, and grant such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

### <u>/s/ Ron Irving</u>

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## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been electronically mailed to all parties and/or counsel of record on this 25<sup>th</sup> day of April, 2023.

### <u>/s/ Ron Irving</u>