

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

In the Matter of the Application of The Empire)
District Electric Company d/b/a Liberty to)
Implement Robust and Mutually-Beneficial) Case No. EO-2022-0078
Energy Efficiency Offerings Under the)
Framework Prescribed by MEEIA)

MOTION FOR RELIEF

COMES NOW The Empire District Electric Company (“Liberty” or “Company”) and, for its Motion for Relief regarding the filing of a plan under the Missouri Energy Efficiency Investment Act (“MEEIA”), respectfully states as follows to the Missouri Public Service Commission (“Commission”).

1. On September 15, 2021, Liberty filed its Application seeking approval of demand-side programs and a Demand-Side Programs Investment Mechanism (“DSIM”) as prescribed by MEEIA (“MEEIA Cycle 1 Application”). Pursuant to a Global Stipulation and Agreement settling all issues with regard to Liberty’s MEEIA Cycle 1 Application and pursuant to the Commission’s *Order Approving Agreement and Tariffs* issued December 15, 2021, effective January 1, 2022, tariff sheets implementing Liberty’s MEEIA Cycle 1 took effect January 1, 2022 (for the period January 1, 2022 - December 31, 2022).

2. On November 4, 2022, a stipulation and agreement was filed requesting a one year extension of Liberty’s MEEIA Cycle 1, to December 31, 2023, to allow Liberty and other stakeholders to incorporate learnings from the initial MEEIA offering year into planning for MEEIA Cycle 2, while continuing to build momentum with Liberty customers and trade allies to generate energy savings (“Extension Stipulation”).

3. Paragraph 7 of the Extension Stipulation provides that “Liberty shall file a three-year cost-effective MEEIA application portfolio for 2024-2026 by the end of May of 2023

(“MEEIA Cycle 2”).” The Commission approved the Extension Stipulation, stating that “(t)he Signatories are ordered to comply with its terms.” Tariffs extending Liberty’s MEEIA Cycle 1 to December 31, 2023, took effect January 1, 2023.

4. At this time, and with the consent or non-objection of all parties, Liberty requests relief from the requirement to file a MEEIA Cycle 2 application by the end of this month, with a determination to be at a later time regarding whether Liberty will file a MEEIA Cycle 2 application or request an extension of its MEEIA Cycle 1.

5. The Missouri Office of the Public Counsel (“OPC”) introduced the idea of a one-year extension of the MEEIA portfolios in Missouri to allow time for all stakeholders to better digest the funding opportunities of the Infrastructure Investment & Jobs Act and the Inflation Reduction Act of 2022, and discussions regarding one-year extensions are taking place among the utilities, OPC, and the Staff of the Commission.

6. The grant of this Motion for Relief will not prejudice any party and will allow for the best use of the parties’ time and other resources.

WHEREFORE, Liberty submits this Motion for Relief and requests an order relieving Liberty of the obligation to file a MEEIA Cycle 2 application by the end May, 2023.

Respectfully submitted,

/s/ Diana C. Carter

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CERTIFICATE OF SERVICE

I hereby certify that the above document was filed in EFIS on this 17th day of May, 2023, and sent by electronic transmission to all counsel of record.

/s/ Diana C. Carter