

**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 Obtain a Certificate of)	Case No. EA-2023-0131
Convenience and Necessity to Enhance)	
System Resiliency)	

MOTION FOR STAY OF PROCEEDINGS

COMES NOW The Empire District Electric Company d/b/a Liberty, and for its Motion for Stay of Proceedings, respectfully states as follows to the Missouri Public Service Commission (“Commission”):

1. On February 14, 2023, Liberty filed its Application for a Certificate of Convenience and Necessity to Enhance System Resiliency, as the Riverton project to enhance the resiliency of the Company’s electric system may require a CCN pursuant to the definitions of “construction” and “asset” in Commission Rule 20 CSR 4240-20.045(1) and 20.045(2)(A).

2. Discovery, through the service of data requests, is being conducted by the Staff of the Commission (“Staff”) and the Office of the Public Counsel (“OPC”). A stay is not requested with regard to data requests.

3. Since the submission of the Application, there have been additional developments regarding the generation interconnection process with the Southwest Power Pool (“SPP”).

4. To allow time for Liberty to address issues with SPP regarding generation interconnection and provide additional information to the Staff of the Commission and other parties to this proceeding regarding the details of the Riverton Units 10 and 11 project, Liberty requests a stay of these proceedings. A stay will not prejudice any party and will make the best use of the parties’ time and other resources.

5. Liberty proposes to provide monthly status reports to the Commission during the pendency of the stay, with the first one to be filed June 15, 2023.

WHEREFORE, Liberty submits this Motion for Stay of Proceedings and requests an order of the Commission relieving Staff of its current obligation to file a recommendation or procedural schedule and otherwise staying these proceedings (with the exception of data requests). Liberty requests such other and further relief as is just and proper under the circumstances.

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 9th day of May, 2023, with a copy sent to all counsel of record.

/s/ Diana C. Carter