

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

In the Matter of The Empire District	)	
Electric Company's 2019 Triennial	)	File No. EO-2019-0049
Compliance Filing Pursuant to 4 CSR 240-22	)	

**MOTION FOR EXTENSION OF TIME**

COMES NOW The Empire District Electric Company, a Liberty Utilities company ("Empire"), by and through counsel, and in support of its Motion for Extension of Time, respectfully states as follows to the Missouri Public Service Commission ("Commission"):

1. Pursuant to Commission Rule 4 CSR 240-22.080(1), Empire's triennial IRP compliance filing is due April 1, 2019.
2. Due to various factors, Empire needs additional time for this filing and requests an extension of approximately 90 days (from April 1 to July 1).
3. Incorporation of distributed energy resources ("DERs") into the modeling is the primary reason for requesting additional time. Distributed generation concepts, approach, and analysis were topics of discussion during stakeholder meetings for Empire's 2019 IRP filing. An additional 90 days will allow Empire to fully model the distributed generation and storage options and vet the outcomes. Additional time is also needed due to the fact that Blake Mertens, one of Empire's primary decision makers in this area, will be leaving the company at the end of this month.
4. All parties to this proceeding – the Staff of the Commission ("Staff"), the Office of the Public Counsel ("OPC"), the Division of Energy, and Renew Missouri – have been contacted regarding this request and do not object to the Commission granting the same.

- a. Although Empire believes the full additional three months may be necessary, Empire will make a good faith effort to try to file earlier, and Empire will make a good faith effort to try to respond to Staff Data Requests and other requests for information from Staff with a quick turnaround following the filing.
- b. Additionally, as requested by OPC, Empire will produce its monthly energy usage and demand forecasts based on Empire's cost-of-service classes (residential, commercial, small heating service, general power, special transmission service contract, total electric building, feed mill and grain service, and large power service) in conjunction with the filing of its 2020 IRP annual update report and continue to comply with Rules 4 CSR 240-22.030(7)(A) and 4 CSR 240-22.020(37) in its subsequent IRP filings, unless, in compliance with the Commission's rules, Empire timely requests and shows good cause for why it should be allowed relief from doing so, and the Commission grants it that relief.

WHEREFORE, Empire requests an order of the Commission extending the due date for the submission of Empire's 2019 triennial IRP filing from April 1, 2019, to July 1, 2019. Empire requests such additional and further relief as is just and proper under the circumstances.

Respectfully submitted,

BRYDON, SWEARENGEN & ENGLAND, P.C.

By:

/s/ Diana C. Carter

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**CERTIFICATE OF SERVICE**

I hereby certify that the above document was filed in EFIS on this 15<sup>th</sup> day of March, 2019, with notification of the same being sent to all parties of record.

/s/ Diana C. Carter