

- 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 15th day of March, 2019, with notification of the same being sent to all parties of record.

/s/ Diana C. Carter