

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

In the Matter of the Application of The	)	
Empire District Electric Company for	)	
Authority to Sell Approximately 35 Miles	)	File No. EO-2015-0172
Of a 161 kV Transmission Line to	)	
Westar Energy Inc.	)	

**RESPONSE TO STAFF RECOMMENDATION**

Comes now The Empire District Electric Company (Empire) and, in response to the Staff Recommendation, states as follows to the Missouri Public Service Commission (Commission):

1. On February 19, 2015, the Staff of the Commission (Staff) filed its Staff Recommendation in this matter. Therein, the Staff suggested that the transaction proposed by Empire would not be detrimental to Empire’s Missouri customers nor would it be detrimental to the public interest in Missouri. Staff further suggested that the Commission issue an order that includes certain specified items (a – g).

2. Empire has no objection to the Staff Recommendation and the specified items for the order, with one clarification. Staff condition “a” states:

Authorizes the Sale for Empire’s Litchfield Transmission Line to Westar at a net book value of \$1,611,734.61, under conditions as described within the Memorandum Recommendation.

3. Empire agrees with Staff’s calculation of the net book value. However, between now and the closing date of this transaction, the net book value will change, if for no other reason than the further accumulation of depreciation reserve related to the subject transmission line. Thus, Empire seeks clarification that it is authorized to sell the

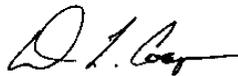
Litchfield Transmission Line to Westar at the net book value of \$1,611,734.61, “as adjusted between now and the closing date.”

4. Counsel for Empire has discussed this issue with counsel for Staff and anticipates that Staff will confirm that the above clarification is consistent with Staff’s intent.

5. Empire further agrees that after closing it will supply Staff with the workpapers used to calculate the final net book value.

**WHEREFORE**, Empire respectfully requests that the Commission grant Empire’s application and issue an order consistent with the Staff Recommendation, subject to the clarification identified herein.

Respectfully submitted,



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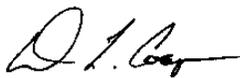
ATTORNEYS FOR THE EMPIRE DISTRICT  
ELECTRIC COMPANY

## CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail, on February 25, 2015, to the following:

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