

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

In the Matter of the Empire District Electric Company,)
Liberty Utilities (Central) Co. and Liberty Sub Corp.) Case No. EM-2016-0213
Concerning an Agreement and Plan of Merger and)
Certain Related Transactions.)

MOTION TO EXTEND FILING OF POSITION STATEMENTS

COME NOW The Empire District Electric Company (“Empire”), Liberty Utilities (Central) Co. (“LU Central”), and Liberty Sub Corp. (sometimes collectively hereinafter “Joint Applicants”), and, for its Motion to Extend filing of Position Statements, states as follows to the Missouri Public Service Commission (“Commission”):

1. On August 17, 2016, the Commission issued its Order Granting Motion for Extension of Time. Therein, the Commission granted a motion to revise the procedural scheduled as follows:

August 16, 2016	Joint List of Issues, order of witnesses, order of parties for cross-examination, order of opening statements
August 22, 2016	Position Statements

2. As a result of the List of Issues extension and additional discussions, the Joint Applicants request that the date for the filing of Position Statements be further extended to August 23, 2016. Doing so would allow for Position Statements to more accurately reflect the positions of the parties in regard to the possible evidentiary hearing. All other procedural schedule dates would remain the same.

3. Counsel for the Joint Applicants has inquired of the other parties as do the proposed extension. Counsel for the Staff of the Commission, the Office of the Public Counsel, MECG, Pittsburg Corning, LiUNA, City of Joplin, Division of Energy, Renew Missouri, Empire District Retired Members & Spouses Association LLC, The Empire District Electric SERP

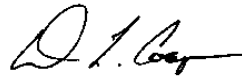
Retirees, and IBEW Locals 1464 and 1474 have affirmatively communicated that they have no objection to such extension. Counsel is not aware of any objection to this proposal.

WHEREFORE, Joint Applicants respectfully request that that Commission sustain this Motion and revise the procedural schedule as proposed herein.

Respectfully submitted,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:



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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent via electronic mail, this 22nd day of August, 2016, to the following:

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