BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of The Empire District Electric)	
Company's Application for Variance From)	File No. EE-2015-0249
Selected Provisions of The Commission's Rules)	
to Electric Utility Resource Planning.)	

RESPONSE TO STAFF RECOMMENDATION

COMES NOW The Empire District Electric Company (Empire or Company), and, in response to Staff's Recommendations to Empire's Requested Variances (Staff Recommendation), states as follows to the Missouri Public Service Commission (the "Commission"):

- 1. On May 11, 2015, the Staff of the Commission filed its recommendation suggesting that the Commission grant Empire's requests for relief as set forth in the Staff Recommendation.
- 2. Empire has reviewed the Staff Recommendation, to include the clarifications provided by the Staff and has no objection to Staff's description of the variances to be granted.

WHEREFORE, Empire respectfully requests that the Commission issue an Order granting Empire a variance from the provisions of 4 CSR 240-3.164, 4 CSR 240-22.030, and 4 CSR 240-22.050, as described in its Application for Variance.

Respectfully submitted,

Dean L. Cooper Mo. Bar 36592

BRYDON, SWEARENGEN & ENGLAND P.C.

312 East Capitol Avenue

P.O. Box 456

Jefferson City, MO 65102-0456

Telephone: (573) 635-7166 Facsimile: (573) 635-0427 dcooper@brydonlaw.com

ATTORNEYS FOR THE EMPIRE DISTRICT ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 20th day of May, 2015, to:

Nathan Williams

Office of the General Counsel nathan.williams@psc.mo.gov staffcounselservice@psc.mo.gov

Office of the Public Counsel opcservice@ded.mo.gov

Ollie Green

Missouri Division of Energy Ollie.Green@ded.mo.gov

Carl Lumley

Curtis, Oetting, Heinz, Garrett & O'Keefe

clumley@lawfirmemail.com

Stuart Conrad Finnegan, Conrad, et al. stucon@fcplaw.com Doug Healy Healy Law Offices

doug@healylawoffices.com

Andrew Linhares Renew Missouri Andrew@renewmo.org

D1.Com