

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

In the Matter of the Application of The )  
Empire District Electric Company for ) File No. EA-2019-0010  
Certificates of Convenience and Necessity )  
Related to Wind Generation Facilities. )

In the Matter of the Application of The )  
Empire District Electric Company for a )  
Certificate of Convenience and Necessity ) File No. EA-2019-0118  
Related to Wind Generation Facilities in )  
Kansas. )

**REPLY TO OPC’S RESPONSE TO MOTION TO CONSOLIDATE**

**COMES NOW** The Empire District Electric Company (“Empire” or “Company”)) and, in Reply to the Response to Motion to Consolidate filed by the Office of the Public Counsel (“OPC”), states as follows to the Missouri Public Service Commission (Commission):

1. On November 18, 2018, Empire has filed an Application for a certificate of convenience and necessity concerning a wind project located in Kansas – Neosho Ridge (File No. EA-2019-0118). On that same date, Empire filed a Motion to Consolidate File No. EA-2018-0118, with the then pending File No. EO-2018-0010, as both of these files concern wind generation projects resulting from Empire’s analysis of whether it could bring savings to its customers by taking advantage of the historically low cost of acquiring new wind generation using tax equity financing to maximize the use of federal tax incentives such as the Production Tax Credits and accelerated depreciation that formed the basis for Empire’s application in Case No. EO-2018-0092.

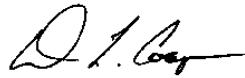
2. On November 28, 2018, OPC filed its Response to Motion to Consolidate, wherein it stated that OPC is amenable to consolidating File No. EA-2018-0118 and File No.

EO-2018-0010, if a procedural schedule identified in the Response were adopted for the consolidated cases.

3. Empire has no objection to the revised procedural schedule identified by OPC, and requests that the Commission grant the requested consolidation, along with issuing an order to adopt the OPC-proposed schedule for the consolidated cases.

4. As to such schedule, Empire would like to emphasize one point. As referenced in footnote 1 of the OPC Response to Motion to Consolidate, it is Empire's understanding that counsel for the Missouri Department of Conservation ("MDC") has a conflict with the March 27-29, 2018, hearing dates. For that reason, and as a result of conversation with MDC's counsel, Empire would ask that the Commission also reserve March 26, 2018, as an additional hearing date for the purpose of trying MDC's issues, if any, in order to accommodate MDC.

**WHEREFORE**, Empire requests a Commission order consolidating Files Nos. EA-2019-0010 and EA-2019-0118, with File No. EA-2019-0010 being the lead case.



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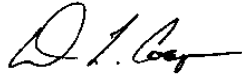
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**ATTORNEYS FOR THE EMPIRE DISTRICT  
ELECTRIC COMPANY**

## CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail, on December 6, 2018, to the following:

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