

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

In the Matter of the 2022 RES Compliance Report    )  
And 2023 RES Compliance Plan of The Empire        )        Case No. EO-2023-0358  
District Electric Company d/b/a Liberty            )

**MOTION FOR EXTENSION**

COMES NOW The Empire District Electric Company d/b/a Liberty (“Liberty” or the “Company”), and for its Motion for Extension regarding the due date for the filing of Liberty’s response to the recent filings made by the Staff of the Commission (“Staff”) and the Office of Public Counsel (“OPC”), Liberty respectfully states as follows:

1.       On April 14, 2023, Liberty filed its 2022 Renewable Energy Standard (“RES”) Compliance Report and its 2023-2025 RES Compliance Plan with the Commission pursuant to Commission Rule 20 CSR 4240-20.100(8). The Commission ordered Staff to review the Report and Plan and file a report.

2.       As a result of discussions among the parties and to correct and clarify certain information, Liberty filed a revised Report and Plan on May 24, 2023.

3.       On May 26, 2023, Staff filed a Motion for Extension to file their report requesting an extension until June 23, 2023. OPC also requested an extension of time to file comments regarding Liberty’s Revised Report and Plan. Both extensions were granted by the Commission.

4.       On June 23, 2023, Staff and OPC filed a Joint Request for an Extension of Time to file comments and recommendations requesting an extension until August 7, 2023. The Commission granted the request on June 26, 2023.

5.       Liberty submitted its second revised RES Compliance Report and Plan on August 4, 2023, and also requested a 10-day extension for Staff and OPC to file comments and

recommendations. The Commission granted Liberty's extension request, which made Staff and OPC's deadline for recommendations and comments August 17, 2023.

6. Both Staff and OPC filed their recommendations and comments on August 17, 2023, making Liberty's response due August 28, 2023.

7. To provide sufficient time for Liberty to review Staff's and OPC's recommendations and comments, Liberty requests an additional 10 days to file their response, to September 7, 2023.

8. Counsel for Staff and OPC have been contacted regarding this Motion, and neither party objects to the granting of the requested extension of time in this matter.

WHEREFORE, Liberty respectfully submits this Motion for Extension and requests such relief as is just and reasonable under the circumstances.

Respectfully submitted,

/s/ Diana C. Carter

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**CERTIFICATE OF SERVICE**

I hereby certify that the above document was filed in EFIS on this 25<sup>th</sup> day of August, 2023, and sent by electronic transmission to all counsel of record.

/s/ Diana C. Carter