

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

In the Matter of the 2021 RES Compliance)
Report and 2022 RES Compliance Plan of The) Case No. EO-2022-0282
Empire District Electric Company d/b/a Liberty)

**RESPONSE TO COMMISSION ORDER
AND REQUEST FOR ADDITIONAL TIME**

COMES NOW The Empire District Electric Company d/b/a Liberty, and for its Response to Commission Order and Request for Additional Time, respectfully states as follows to the Missouri Public Service Commission (“Commission”):

1. On April 14, 2022, Liberty submitted its 2021 Renewable Energy Standards (“RES”) Compliance Report and 2022-2024 RES Compliance Plan, pursuant to Commission Rule 20 CSR 4240-20.100(8).
2. The Commission’s Rule requires the Staff of the Commission (“Staff”) to file a report about Liberty’s RES Compliance Report and Plan, and offers other interested persons or entities an opportunity to file comments.
3. Staff filed its report herein on June 1, 2022. Staff’s report recommends that Liberty supplement its RES filing with updates on three alleged deficiencies:
 - a. The Renewable Energy Credits (“REC”) generated by owned facilities and the associated value is lacking information for all owned facilities in Section D.
 - b. Reported RECs sold information differs between Section E of the report and Attachment 3.
 - c. The calendar year retail rate impact calculation reported in Section P does not include all resources used for compliance in the year.
4. On June 10, 2022, the Commission issued its *Order Establishing Time to Respond to Staff’s Report*, directing any responses to Staff’s report to be filed by no later than June 25, 2022, and stating as follows:

Before deciding whether any additional information is required or whether any concerns or deficiencies need to be addressed, the Commission will establish a time for the filing of responses to Staff's report.

5. Liberty has been working with Staff to address Staff's concerns, and Liberty has reached out to its consultant for additional assistance. Liberty requests an additional two weeks to review the retail rate impact calculation and otherwise consider Staff's recommendations as set out in Staff's report.
6. Staff consents to the requested extension of time.

WHEREFORE, Liberty requests an additional two weeks to review and consider Staff's recommendations. Liberty requests such other and further relief as is just and proper 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 24th day of June, 2022, with a copy sent by electronic mail to the Staff of the Commission and the Office of the Public Counsel.

/s/ Diana C. Carter