

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

In the Matter of The Empire District Electric)	
Company's 2019 Triennial Compliance)	File No. EO-2019-0049
Filing Pursuant to 4 CSR 240-22)	

REPLY REGARDING APPLICATION FOR VARIANCES

COMES NOW The Empire District Electric Company, a Liberty Utilities company ("Empire"), and submits this Reply Regarding Application for Variances regarding 4 CSR 240-22.030 and 4 CSR 240-20.094 and in response to the Commission orders issued herein on October 26 and November 7, 2018. In this regard, Empire respectfully states as follows to the Missouri Public Service Commission (the "Commission"):

1. Empire is seeking variances from portions of Commission Rules 4 CSR 240-22.030 and 4 CSR 240-20.094 with regard to Empire's 2019 IRP triennial compliance filing. Appendix A (Demand-Side Resource Analysis) and Appendix B (Load Analysis and Load Forecasting) attached to Empire's Application identified the specific portions of the Rules for which Empire is requesting variances and the justification. The variances being requested herein were previously requested and granted by the Commission in File Nos. EE-2015-0249 and EO-2016-0223.

2. The Staff of the Commission ("Staff") and the Office of the Public Counsel ("OPC") submitted responses regarding Empire's Application. It is Empire's understanding that Staff does not object to the requested variances being granted. It is also Empire's understanding that OPC does not object to the requested variances being granted under one condition. Empire does not object to this condition.

3. As such, Empire hereby agrees to refrain from seeking the same variance regarding aggregating customer data for Empire's 2022 triennial filing (i.e., Empire commits to using cost-of-service classes in its next triennial filing analyses), unless OPC agrees that such a variance request would be reasonable and appropriate.

WHEREFORE, Empire respectfully requests that the Commission issue an Order granting Empire variances from the provisions of Commission Rules 4 CSR 240-22.030 and 4 CSR 240-20.094 related to the Demand-Side Resource Analysis and Load Analysis and Forecasting of Electric Utility Resource Planning, as described in the Appendix A and Appendix B attached to Empire's Application.

Respectfully submitted,

BRYDON, SWEARENGEN & ENGLAND, P.C.

By:

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CERTIFICATE OF SERVICE

I hereby certify that the above document was filed in EFIS on this 7th day of November, 2018, with notification of the same being sent to all parties of record.

_____/s/ Diana C. Carter