

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

In the Matter of the Application of The Empire)
District Electric Company for a Certificate of)
Convenience and Necessity Related to Wind)
Generation Facilities)

File No. EA-2019-0010

**MISSOURI DIVISION OF ENERGY'S
STATEMENT OF POSITIONS**

COMES NOW the Missouri Department of Economic Development – Division of Energy (“DE”), and pursuant to Missouri Public Service Commission (“Commission”) Rule 4 CSR 240-2.140(4), respectfully offers the following statement of DE’s positions on The Empire District Electric Company’s (“Empire” or “Company”) requests for Certificates of Convenience and Necessity (“CCNs”). DE has not taken a position on all issues presented in the filed List of Issues, but reserves the right to take a position on those issues as the case progresses and evidence is presented to the Commission:

1. Does the evidence establish that the Kings Point, Neosho Ridge, and North Fork Ridge wind projects for which The Empire District Electric Company ("Empire") is seeking certificates of convenience and necessity (“CCN”) are “necessary or convenient for the public service” within the meaning of that phrase in section 393.170, RSMo.?

Yes. The proposed projects will create economic development benefits and improve the diversity and security of Missouri’s energy supply. All of these factors support Missouri’s ability to perform more competitively on the national economic stage. The projects are also consistent with recent Commission orders and meet the Commission’s criteria regarding

“need” and “public interest.” For these reasons, the Commission should grant the requested CCNs. (Rebuttal Testimony of Martin R. Hyman, page 2, lines 8-17.)

2. For each CCN the Commission grants, what conditions, if any, should the Commission deem to be reasonable and necessary, and impose?

DE has not taken a position on this issue but reserves the right, in its post-hearing briefs, to rebut or support conditions proposed consistent with any party’s testimony.

WHEREFORE, the Division of Energy respectfully offers the above statement of its position on certain issues, and retains the right to take future positions on these and other issues as the case progresses.

Respectfully submitted,

/s/ Rochelle L. Reeves

Rochelle L. Reeves, Bar #51058

General Counsel

Missouri Department of Economic Development

P.O. Box 1157

Jefferson City, MO 65102

573-526-2423

reeves.deenergycases@ded.mo.gov

**Attorney for Missouri Department of Economic
Development – Division of Energy**

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been emailed to the certified service list this 22nd day of March, 2019.

/s/ Rochelle L. Reeves