

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of The Empire District Electric)
Company's Application for Variance From) File No. _____
Selected Provisions of The Commission's Rules)
to Electric Utility Resource Planning.)

APPLICATION FOR VARIANCE

COMES NOW The Empire District Electric Company (Empire or Company), and in support of its Application for Variance ("Application") from provisions of 4 CSR 240-22.030 and 4 CSR 240-22.050, of the Rules of Missouri Public Service Commission (the "Commission"), states as follows:

1. Empire is a Kansas corporation with its principal office and place of business at 602 South Joplin Avenue, Joplin, Missouri 64802. Empire is qualified to conduct business and is conducting business in Kansas as well as in the states of Missouri, Arkansas and Oklahoma. Empire is engaged, generally, in the business of generating, purchasing, transmitting, distributing and selling electric energy in portions of said states. Empire also provides water service and natural gas distribution service in Missouri. Empire's Missouri operations are subject to the jurisdiction of the Commission as provided by law.

2. A certified copy of Empire's Restated Articles of Incorporation, as amended, was filed in Case No. EF-94-39 and is incorporated herein by reference in accordance with Commission rule 4 CSR 240-2.060(1)(G). A Certificate from the Missouri Secretary of State that Empire, a foreign corporation, is authorized to do business in Missouri was filed with the Commission in Case No. EM-2000-369 and is incorporated by reference in accordance with Commission rule 4 CSR 240-2.060(1)(G). This information is current and correct. Empire has no pending actions or final unsatisfied judgments or decisions against it from any state or federal

agency or court that involve customer service or rates. Empire's annual report and assessment fees are not overdue.

3. Communications in regard to this Application should be addressed to the undersigned counsel and:

Mr. Todd Tarter
The Empire District Electric Company
602 South Joplin Avenue
P.O. Box 127
Joplin, Missouri 64802
Phone: (417) 625-6533
Fax: (417) 625-5173
E-mail: ttarter@empiredistrict.com

4. Empire is seeking a variance of portions of 4 CSR 240-3.164, 4 CSR 240-22.030, and 4 CSR 240-22.050. Appendix A (Demand-Side Resource Analysis) and Appendix B (Load Analysis and Load Forecasting) attached to this Application identify the specific portions of the rules for which Empire is requesting a variance and the justification.

5. The load forecasting variance request was discussed in the Joint Filing to Empire's 2013 integrated resource plan (IRP) in File No. EO-2013-0547.

6. Empire plans to file an integrated resource plan with the Commission in April 2016. The study will comply with the Commission's Rule except for those aspects of the rule where a variance is specifically requested.

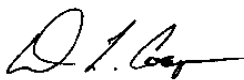
7. According to 4 CSR 240-22.010 Policy Objectives, the fundamental objective of the resource planning process at electric utilities shall be to provide the public with energy services that are safe, reliable, and efficient, at just and reasonable rates, in compliance with all legal mandates, and in a manner that serves the public interest and is consistent with state energy and environmental policies. The variances requested by Empire will not compromise this objective. In fact, the granting of the requested variances will save considerable time and

expense in a very time consuming and detailed integrated resource planning endeavor.

Approval of this Application would therefore be in the public interest.

WHEREFORE, Empire respectfully requests that the Commission issue an Order granting Empire a variance from the provisions of 4 CSR 240-3.164, 4 CSR 240-22.030, and 4 CSR 240-22.050, related to the Demand-Side Resource Analysis and Load Analysis and Forecasting of Electric Utility Resource Planning that are described in the Appendix A and Appendix B.

Respectfully submitted,



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ATTORNEYS FOR THE EMPIRE DISTRICT
ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 1st day of April, 2015, to:

Nathan Williams
Office of the General Counsel
nathan.williams@psc.mo.gov
staffcounsel@psc.mo.gov

Office of the Public Counsel
opcservice@ded.mo.gov

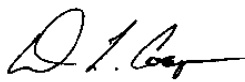
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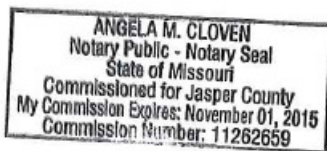
VERIFICATION

STATE OF MISSOURI)
)
COUNTY OF Jasper) SS

I, Blake Mertens, state that I am employed by The Empire District Electric Company ("Empire") as Vice President Energy Supply; that I have read the attached document; that the statements contained therein are true and correct to the best of my information, knowledge and belief; and, that I am authorized to make this statement on behalf of Empire.



Subscribed and sworn to before me this 1 day of April, 2015.




Notary Public

My Commission Expires:

11/01/15