

**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) Case No. EA-2019-0010
Convenience and Necessity Related to its Customer)
Savings Plan)

In the Matter of the Application of The Empire)
District Electric Company for a Certificate of) Case No. EA-2019-0118
Convenience and Necessity Related to its Customer)
Savings Plan)

RESPONSE TO MOTION TO CONSOLIDATE

COMES NOW the Office of the Public Counsel and responds to Empire’s motion to consolidate Case Nos. EA-2019-0010 and EA-2019-0118 as follows:

1. On Sunday, November 18, 2018, Empire filed its application for a certificate of convenience and necessity for a wind project located in Kansas—Neosho Ridge—and moved to consolidate its application with its pending case for its applications for certificates of convenience and necessity for two wind projects located in Missouri—Kings Point and North Fork Ridge that it filed on October 18, 2018.

2. After discussions with Empire shared with the other parties to these cases, if the ordered procedural schedule for Case No. EA-2019-0010 is amended as shown below (3rd column), the response time for responding to data requests is shortened from twelve (12) to seven (7) days, and the other provisions of that order are also applied to Case No. EA-2019-0118, then the Office of the Public Counsel is amenable to consolidating Case Nos. EA-2019-0010 and EA-2019-0118, subject to the newly proposed procedural schedule.

EVENT	EA-2019-0010 ORDERED	PROPOSED FOR CONSOLIDATED CASES
Technical/Settlement Conference	December 17, 2018	December 17, 2018
Technical/Settlement Conference		January 17, 2019
Rebuttal Testimony	January 4, 2019	February 5, 2019
Technical/Settlement Conference		February 13, 2019
Surrebuttal and Cross-Surrebuttal	February 7, 2019	March 5, 2019
Last Day to Request Discovery	February 19, 2019	March 13, 2019
List of Issues, Etc.	February 19, 2019	March 19, 2019
Position Statements	February 22, 2019	March 22, 2019
Evidentiary Hearing	March 5-7, 2019	March 27-29 2019 ¹
Initial Briefs	March 21, 2019	April 12, 2019
Reply Briefs	April 4, 2019	April 26, 2019

3. The Office of the Public Counsel is not proposing an additional local public hearing for purposes of Case No. EA-2019-0118, but, since the Commission has not yet ordered a local public hearing for Case No. EA-2019-0010, the Office of the Public Counsel proposes that the local public hearing it suggested on November 2, 2018, be held in Carthage, Missouri, be held for both Case Nos. EA-2019-0010 and EA-2019-0118.

WHEREFORE, the Office of the Public Counsel responds to Empire’s motion to consolidate as set forth above.

¹ Empire has informed the Office of the Public Counsel that the Missouri Department of Conservation has a conflict with the proposed March 27-29, 2019, hearing dates and may seek for its issues to be heard on March 26, 2019. If that request is made, the Office of the Public Counsel does not oppose it.

Respectfully,

/s/ Nathan Williams

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 28th day of November 2018.

/s/ Nathan Williams