

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

In the Matter of The Empire District Electric	)	
Company's 2019 Triennial Compliance Filing	)	File No. EO-2019-0049
Pursuant to 20 CSR 4240-22	)	

**PUBLIC COUNSEL'S RESPONSE TO JOINT AGREEMENT**

The Office of Public Counsel (OPC) responds to the Joint Agreement as follows:

1. The Empire District Electric Company (Empire) filed its latest triennial compliance filing as for its integrated resource plan (IRP) on Jun 28, 2019.
2. The Staff of the Public Service Commission (Staff) issued its Report evaluating Empire's IRP compliance filing on February 28, 2020. Staff noted thirteen deficiencies and five areas of concern in Empire's filing.
3. Empire later met with Staff, the OPC, and other stakeholders to discuss Staff's findings, and the appropriate responses thereto.
4. Empire presented supplementary information, and pledged to undertake certain actions, that it believes alleviate Staff's findings of deficiencies and concerns. Empire describes its efforts in its Joint Agreement. The OPC does not agree with Empire's descriptions, and believes that the deficiencies and concerns persist notwithstanding Empire's actions.
5. However, Empire has also recently initiated the 2020 IRP Annual Update process in docket number EO-2020-0284. The OPC believes that the remaining deficiencies and concerns can be best addressed through the Annual Update's associated workshop and stakeholder engagement process, rather than continue to debate them in this forum. The OPC is not asking for a hearing regarding this disagreement at this time.

**WHEREFORE**, the OPC responds to the Joint Agreement.

Respectfully,

OFFICE OF THE PUBLIC COUNSEL

/s/ Caleb Hall

Caleb Hall, #68112

200 Madison Street, Suite 650

Jefferson City, MO 65102

P: (573) 751-4857

F: (573) 751-5562

[Caleb.hall@ded.mo.gov](mailto:Caleb.hall@ded.mo.gov)

**Attorney for the Office of the Public  
Counsel**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served, either electronically or by hand delivery or by First Class United States Mail, postage prepaid, on this 29<sup>th</sup> Day of April, 2020, with notice of the same being sent to all counsel of record.

/s/ Caleb Hall