

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

In the Matter of Staff's Audit of The Empire)
District Electric Company's Conversion of)
Riverton Generating Station Unit 12 to a)
Combined Cycle Unit.)
)
)

Case No. EO-2014-

MOTION TO OPEN CASE

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission") and for its *Motion to Open Docket* states as follows:

1. The Empire District Electric Company ("Empire") is the owner and operator of the Riverton Generating Station ("Riverton").

2. Empire is converting Riverton Unit 12 from a simple cycle combustion turbine to a combined cycle unit.

3. In documents Empire has released to date, Empire has described the major components of the conversion to be constructed to be:

- a. A heat recovery steam generator,
- b. A steam turbine generator,
- c. An auxiliary boiler,
- d. A cooling tower, and
- e. Other auxiliary equipment.

4. Staff requests that the Commission open this docket to facilitate and retain discovery related to Staff's audit of the Riverton Unit 12 Conversion.

5. Staff anticipates that any disputes related to the level of Empire's prudent investment in the Riverton Unit 12 Conversion would be made in the general rate case where Empire seeks to include its costs of the Riverton Unit 12 Conversion in rate base, and not in this docket.

WHEREFORE, Staff respectfully requests that the Commission open a case to facilitate and retain discovery related to Staff's audit of Empire's Conversion of Riverton Generating Station Unit 12 to a Combined Cycle Unit.

Respectfully submitted,

/s/ Sarah Kliethermes

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 10th day of September, 2013.

/s/ Sarah Kliethermes