

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

In the Matter of the Application of The            )  
Empire District Electric Company for            )  
Certificates of Convenience and Necessity        )  
Related to Wind Generation Facilities.            )            File No. EA-2019-0010

In the Matter of the Application of The            )  
Empire District Electric Company for a            )  
Certificate of Convenience and Necessity        )  
Related to Wind Generation Facilities in         )  
Kansas.    )            File No. EA-2019-0118

**MOTION TO CONSOLIDATE**

**COMES NOW** The Empire District Electric Company (“Empire” or “Company”)) and, as its Motion to Consolidate, states as follows to the Missouri Public Service Commission (Commission):

1.       On October 18, 2018, Empire filed an Application with the Commission for certificates of convenience and necessity concerning two wind projects located in Missouri – Kings Point and North Fork Ridge – each comprising approximately 150 MW of wind generation. That application was assigned File No. EA-2019-0010.

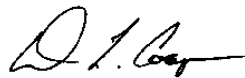
2.       On this date, Empire has filed an Application for a certificate of convenience and necessity concerning a wind project located in Kansas – Neosho Ridge. That Application has been assigned File No. EA-2019-0118.

3.       Both of these files concern wind generation projects resulting from Empire’s analysis of whether it could bring savings to its customers by taking advantage of the historically low cost of acquiring new wind generation using tax equity financing to maximize the use of federal tax incentives such as the Production Tax Credits and accelerated depreciation that formed the basis for Empire’s application in Case No. EO-2018-0092. Accordingly, there are

common questions of law and fact in the above-referenced cases and the consolidation of Files Nos. EA-2019-0010 and EA-2019-0118 would be administratively expedient in that it would simplify the filings to be made by Empire and the other parties to these matters.

4. Commission Rule “4 CSR 240-2.110(3) allows the Commission to consolidate pending actions involving related questions of law or fact.” Order Consolidating Cases, *In the Matter of the Application of Oakview Water and Sewer Company, LLC*, Case No. WA-2007-0201 (December 4, 2006).

**WHEREFORE**, Empire requests a Commission order consolidating Files Nos. EA-2019-0010 and EA-2019-0118, with File No. EA-2019-0010 being the lead case.



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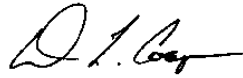
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**ATTORNEYS FOR THE EMPIRE DISTRICT  
ELECTRIC COMPANY**

## CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail, on November 18, 2018, to the following:

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