# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of The	)	
Empire District Electric Company d/b/a	)	
Liberty to Implement Robust and Mutually-	)	File No. EO-2022-0078
Beneficial Energy Efficiency Offerings	)	
Under the Framework Prescribed by MEEIA	)	

## **MOTION FOR EXTENSION**

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through the undersigned counsel, and for its *Motion for Extension* requests an extension until November 23, 2021 to file a stipulation or status report. In support, Staff states the following:

- 1. On September 15, 2021, the Empire District Electric Company d/b/a Liberty ("Liberty") filed tariff sheets and an application seeking the Commission's approval to establish a Demand–Side Programs Investment Mechanism (DSIM). Liberty's tariff sheets bear a November 14, 2021, effective date, and Liberty asks that its application be approved to be effective by that date.
- 2. On October 5, 2021, the Commission filed its *Amended Order Directing Notice and Establishing Intervention Date*, directing Staff to file a pleading no later than October 15, 2021, stating the date that it will submit a recommendation.
- 3. On October 15, 2021, Staff filed its *Status Report*, suggesting November 15, 2021 as the date Staff expected to file its recommendation, or a stipulation in lieu of.

- 4. On October 20, 2021, the Commission issued its *Order Directing Staff to File a Recommendation, Setting a Time for Responses, and Suspending Tariff*, suspending Liberty's tariff sheets until January 1, 2022, and setting November 15, 2021 as the date for Staff's recommendation.
- 5. Progress towards a stipulation is still ongoing, and it is expected that a stipulation will be filed in the next two weeks. Therefore, Staff respectfully requests an extension, until November 23, 2021, for the filing of Staff's recommendation, or a stipulation in lieu of.

**WHEREFORE**, Staff respectfully requests an extension until November 23, 2021 for a Staff recommendation, or a stipulation in lieu of.

Respectfully submitted,

#### /s/ Nicole Mers

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### **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, emailed or mailed, postage prepaid, to counsel for all parties on this 15<sup>th</sup> day of November, 2021.

# /s/ Nicole Mers