

**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 Obtain a Certificate of	)	<b><u>File No. EA-2023-0131</u></b>
Convenience and Necessity to Enhance	)	
System Resiliency	)	

**MOTION FOR EXTENSION**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”), by and through the undersigned counsel, and for its *Motion for Extension* states:

1. On February 14, 2023, The Empire District Electric Company d/b/a Liberty (“Liberty”) filed an application (“Application”) for a Certificate of Convenience and Necessity (CCN) to construct, install, own, operate, maintain, and otherwise control and manage two combustion turbine generators, each with a nominal net output of 13.3 MW to replace existing combustion turbine generators, Riverton Unit 10 and Riverton Unit 11.
2. On May 9, 2023, Liberty filed its *Motion for Stay of Proceedings*, in order to address Southwest Power Pool (SPP) issues that involve the generation plant at issue in the Application. The Commission granted this request on May 10, 2023.
3. On October 13, 2023, Liberty filed its *Amended Application for a Certificate of Convenience and Necessity*, requesting a lifting of the stay and approval of its amended application.
4. The Commission ordered Staff to file a recommendation or procedural schedule by December 15, 2023, in its *Order Directing Staff Recommendation or Joint Proposed Procedural Schedule* issued November 2, 2023.
5. Staff has been diligently reviewing the amended application and issuing discovery. Staff has had conversations with Liberty about an additional filing,

containing supplemental evidence and justifications for the record that would allow a Staff recommendation and potentially obviate the need for a procedural schedule or evidentiary hearing.

6. In light of these discussions, Staff respectfully asks the Commission grant an extension, until January 14, 2024, for parties to file a status report on the progress of these discussions, or a procedural schedule, containing a new date for a Staff recommendation or rebuttal testimony.

**WHEREFORE**, Staff prays the Commission accepts its *Motion for Extension*, and grant such other and further relief as it deems just under the circumstances

Respectfully submitted,

**/s/ Nicole Mers**

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**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 15th day of December, 2023.

**/s/ Nicole Mers**