

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

The Empire District Electric Company's)
2010 Utility Resource Filing Pursuant) Case No. EO-2011-0066
to 4 CSR 240 – Chapter 22)

MOTION FOR EXTENSION

COMES NOW The Empire District Electric Company (Empire), pursuant to Missouri Public Service Commission (Commission) Rule 4 CSR 240-22.080(12), and, as its Motion for Extension, states as follows to the Commission:

1. On September 3, 2010, Empire filed its 2010 Integrated Resource Planning Filing (IRP), which is required by the Commission's Integrated Resource Planning Rule, 4 CSR 240-22. On January 3, 2011, the Commission Staff (Staff), the Missouri Department of Natural Resources (DNR), and Dogwood Energy, LLC (Dogwood) filed comments regarding what they contend to be deficiencies in the IRP filed by Empire.
2. Commission Rule 4 CSR 240-22.080(8) allows the parties 45 days to work with the utility to submit a plan to remedy the alleged deficiencies (or until February 17, 2011). Commission Rule 4 CSR 240-22.080(9) allows the utility and the other parties until the 60th day after the filing of comments to file a response to the alleged deficiencies (or until March 4, 2011).
3. Empire has met with the parties to this case to discuss the alleged deficiencies and progress toward an agreement has been made. However, the parties will need additional time to better determine whether an agreement can be reached and, if so, to memorialize that agreement in a stipulation and agreement.

4. Commission Rule 4 CSR 240-22.080(12) states that “The commission may extend or reduce any of the time periods specified in this rule for good cause shown.”

5. Empire believes that an additional thirty (30) days, or until March 19, 2011, would allow the parties sufficient time to address these issues. Accordingly, Empire asks that the Commission grant an extension from the provisions of 4 CSR 240-22.080(8) and 4 CSR 240-22.080(9) such that the parties have until March 19, 2011, to submit a plan to remedy the alleged deficiencies and until 15 days thereafter (or until April 3, 2011) for Empire and the other parties to file a response to the alleged deficiencies, if necessary.

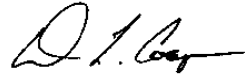
6. The opportunity to possibly resolve this matter through an agreement of the parties that would be afforded by the requested extension serves the public interest and administrative economy and, therefore, constitutes good cause.

7. Staff, the Office of the Public Counsel, DNR, Dogwood and the Missouri Joint Municipal Electric Utility Commission have stated that they support this Motion for Extension. Counsel for Praxair, Inc. has stated that Praxair has no objection to this Motion.

WHEREFORE, Empire respectfully requests that the Commission grant the

extension requested herein.

Respectfully submitted,



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ATTORNEYS FOR THE EMPIRE DISTRICT
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Certificate of Service

I hereby certify that on the 14th day of February, 2011, a true and correct copy of the above and foregoing was sent by electronic mail to the following:

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