

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

In the Matter of The Empire District Electric     )  
Company’s Submission of Its Interim Report     )     **File No. EO-2012-0269**  
Regarding Participation in the Southwest     )  
Power Pool, Inc.     )

**STAFF RESPONSE TO LIBERTY’S 2024 MOTION  
FOR CONTINUATION OF CONDITIONAL APPROVAL**

**COMES NOW** Staff of the Missouri Public Service Commission and for its response to the Motion for Continuation of Conditional Approval (“Motion”) filed herein by The Empire District Electric Company d/b/a Liberty (“Liberty” or “Company”) on April 16, 2024, states as follows:

1. On September 11, 2013, the Commission approved a stipulation and agreement that provided for Liberty/Empire’s continued participation in SPP (the Southwest Power Pool) through August 1, 2019. That stipulation and agreement contained provisions that required Liberty/Empire to undertake a cost/benefit study and prepare an interim report.

2. Liberty’s continued participation in SPP has been extended several times since then without Liberty ever filing the cost/benefit study and interim report required by the 2013 stipulation and agreement (which has been stayed for various reasons).

3. Liberty’s most recent Motion, filed on April 16, 2024, asks the Commission to extend the previously granted approval of Liberty’s membership in the Southwest Power Pool by one year, from August 1, 2024, to August 1, 2025.

4. On April 18, 2024, the Commission issued its *Order Establishing Time to Respond to Motion to Extend Conditional Approval* (“Order”). The Order provided that

“Any party wishing to respond to [Liberty’s Motion] shall do so no later than April 30, 2024.”

5. Staff is filing this Response to simply inform the Commission that Staff has no objection to the requested extension on the same terms and conditions as previously ordered, at this time.

**WHEREFORE** Staff submits this Response to the Commission’s Order issued April 18, 2024.

Respectfully submitted,

**/s/ Jeffrey A. Keevil**

Jeffrey A. Keevil

Deputy Counsel

Missouri Bar No. 33825

P. O. Box 360

Jefferson City, MO 65102

(573) 526-4887 (Telephone)

(573) 751-9285 (Fax)

Email: [jeff.keevil@psc.mo.gov](mailto:jeff.keevil@psc.mo.gov)

Attorney for the Staff of the  
Missouri Public Service Commission

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System on this 26<sup>th</sup> day of April 2024.

**/s/ Jeffrey A. Keevil**