

**BEFORE THE MISSOURI
PUBLIC SERVICE COMMISSION**

In the Matter of the Application of)
Southway Storage for Change of Electric Supplier)
From the Empire District Electric Company) File No. EO-2024-0194
d/b/a Liberty to White River Valley Electric)
Cooperative, Inc.)

**SOUTHWAY STORAGE, LLC'S
MOTION TO STAY**

COMES NOW Applicant Southway Storage, LLC (“Southway”), by and through counsel, and for its Motion to Stay, respectfully states as follows:

1. On December 12, 2023, Southway filed an Application For Change Of Electric Service Provider (“Application”) with the Commission, requesting a change in electric supplier from the Empire District Electric Company d/b/a Liberty (“Liberty”) to White River Electric Cooperative (“White River”) at the property located at the southwest corner of F Highway and Highway 65 in Ozark, MO.

2. This matter is currently set for hearing on September 12, 2024, at 10 a.m. Southway and Liberty have been in discussions to resolve the matter whereby Southway agrees to have Liberty provide the electric service to the property.

3. Southway and Liberty have an agreement in principle and are continuing to negotiate a final resolution, which would negate the need for a hearing in this matter. Once an agreement has been finalized, Southway would expect to file a Motion to Dismiss. The parties expect that this will occur promptly.

4. Liberty supports the motion. Undersigned counsel has contacted Staff and White River, who have no objections to the Commission staying the proceedings.

WHEREFORE, Southway respectfully requests that the Commission stay all further proceedings in this docket until such time as a formal agreement is finalized and a Motion to Dismiss can be filed.

Respectfully Submitted,

By: /s/ Terry M. Jarrett
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***ATTORNEY FOR SOUTHWAY
STORAGE, LLC***

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of September, 2024, a copy of the foregoing has been served on all parties on the official service list for this matter via filing in the Commission's EFIS system and/or email.

/s/ Terry M. Jarrett
Terry M. Jarrett