## BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

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In the Matter of the Application of Vicinity Energy Kansas City, Inc. for Approval of Deed of Trust Modification

File No. HO-2025-0153

## **RESPONSE TO STAFF RECOMMENDATION**

COMES NOW Vicinity Energy Kansas City, Inc., (Vicinity) by and through the undersigned counsel and pursuant to 20 CSR 4240-2.080(13) and Commission Order hereby submits its Response to Staff Recommendations.

- On January 2, 2025, Staff submitted its Recommendation that the Commission approve Vicinity's Application, including the waiver of Rule 20 CSR 240-4.017(1), subject to three conditions set forth in the Recommendation.
- 2. Vicinity does not object to Staff's three proposed conditions of approval.

WHEREFORE, Vicinity prays the Commission to approve its Application pursuant to Staff's Recommendation.

CURTIS, HEINZ, GARRETT & O'KEEFE, P.C.

/s/ Carl J. Lumley\_\_\_\_\_ Carl J. Lumley, #32869 130 S. Bemiston, Suite 200 St. Louis, Missouri 63105 (314) 725-8788 (314) 725-8789 (Fax) Email: clumley@chgolaw.com

Attorney for Vicinity Energy Kansas City, Inc.

## **CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing document was either mailed, faxed, or emailed this 3d day of January 2025 to the persons on the attached list:

/s/ Carl J. Lumley

Missouri Public Service Commission General Counsel Office P.O. Box 360 200 Madison Street, Suite 800 Jefferson City, MO 65102 Staffcounselservice@psc.mo.gov

Office of Public Counsel P.O. Box 2230 200 Madison Street, Suite 650 Jefferson City, MO 65102 opcservice@ded.mo.gov