

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

In the Matter of the Request of The)
Empire District Electric Company d/b/a)
Liberty for Authority to File Tariffs)
Increasing Rates for Electric Service)
Provided to Customers In its Missouri)
Service Area

File No. ER-2024-0261
Tracking No. JE-2025-0069

JOINT RESPONSE TO COMMISSION ORDER

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), on behalf itself, the Empire District Electric Company (“Liberty”), the Empire District Retired Members & Spouses Association, LLC (“EDRA”), the Midwest Energy Consumers Group (“MECG”), Renew Missouri, and Influent Energy, and respectfully submits the following response to the Commission’s December 20, 2024,¹ order:

1. On December 13, Staff filed the *Joint Proposed Procedural Schedule* (Joint Proposal) on behalf of the Parties as directed by the Commission on December 2.² The Commission issued an Order Setting Procedural Schedule (“Order”) on December 20. Later that day, the Office of the Public Counsel (“OPC”) filed its *Public Counsel's Motion to Correct/Clarify Procedural Schedule*.³ OPC offered the following revision to section d. of the Discovery Procedures in its *Motion*:

After the filing of Surrebuttal testimony (June 23, 2025), the response time for data requests shall be five (5) **calendar** days to provide the requested information, and two (2) business days to object or notify that more than five (5) calendar days will be needed to provide the requested information. Data requests sent after 5:00 pm will be considered served on the next business day. The Commission may rule on discovery motions filed after Surrebuttal testimony is filed without holding the conference required by 20 CSR 4240- 2.090(8)(B). (Emphasis added).

¹ Order Directing Responses. Unless otherwise stated, all dates hereafter are in reference to 2024.

² Notice of Order Issued During Procedural Conference.

³ Public Counsel's Motion to Correct/Clarify Procedural Schedule.

2. The submitted *Joint Proposal* underwent several revisions, with the filed version inadvertently missing the above-referenced language that the Parties agreed upon during procedural discussions. Thus, it is the Parties intention that the Commission correct the *Procedural Schedule* so that the Parties have five (5) calendar days to provide requested information, and two (2) business days to object or notify that more than five (5) calendar days will be needed to provide requested information.

3. Staff reached out to Local 1474's counsel but did not receive a response.

WHEREFORE, the Parties, respectfully requests s the Commission to issue an order which corrects/clarifies the ordered procedural schedule to reflect that after the filing of Surrebuttal testimony (June 23, 2025), the response time for data requests shall be five (5) calendar days to provide the requested information, and two (2) business days to object or notify that more than five (5) calendar days will be needed to provide the requested information.

Respectfully submitted,

/s/ Eric Vandergriff

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or electronically mailed to all parties and/or counsel of record on this 6th day of January 2025.

/s/ Eric Vandergriff