

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

In the Matter of the Petition of The Empire)
District Electric Company d/b/a Liberty to Obtain)
a Financing Order that Authorizes the Issuance) **Case No. EO-2022-0040**
of Securitized Utility Tariff Bonds for Qualified)
Extraordinary Costs)

In the Matter of the Petition of The Empire)
District Electric Company d/b/a Liberty to Obtain)
a Financing Order that Authorizes the Issuance) **Case No. EO-2022-0193**
of Securitized Utility Tariff Bonds for Energy)
Transition Costs Related to the Asbury Plant)
)

**MOTION REQUESTING LEAVE TO PERMIT MARK DAVIS TO APPEAR REMOTELY, AND
REQUEST FOR EXPEDITED TREATMENT**

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and respectfully requests the Commission to issue an order granting leave permitting Staff Witness Mark Davis to appear remotely at the hearing in the above-captioned cases, and in support states:

1. Mark Davis, of Ducera Partners, LLC (Ducera), is an outside retained expert of Staff.
2. Permitting Mr. Davis to appear remotely will save considerable travel and lodging expense associated with appearing in person.
3. Such travel and lodging expenses would be a cost associated with retaining a financial advisor “sand shall be included as financed costs in the securitized utility tariff charge....” § 393.1700.2(3)(b), RSMo (Supp. 2021).
4. Permitting Mr. Davis to appear remotely will therefore likely save Liberty’s ratepayers the expense of travel.
5. Staff believes the Commission has sufficient technology and experience with Webex technology to adequately accommodate the request of Mr. Davis to appear remotely, with video and audio connection quality sufficient to permit the parties and the Commission to review Mr. Davis’s testimony in substantially the same form as if Mr. Davis appeared in person.

Mr. Davis and Ducera have access to sufficient video and audio equipment, sufficient bandwidth, and the Webex software to permit Mr. Davis to effectively appear in person.

6. Counsel for Staff has contacted counsel for Liberty and the Office of the Public Counsel, and Liberty and the Office of Public Counsel indicated no objection to Staff's request for Mr. Davis to appear remotely.

7. Staff asks the Commission to grant Staff's request by Friday, June 10, 2022, in order to permit Mr. Davis to confirm that no travel plans are necessary.

8. There will be no harm to Liberty's customers or the general public for Mr. Davis to appear remotely as described above.

9. Based on the press of other business, this motion was filed as soon as possible.

WHEREFORE, Staff respectfully requests the Commission issue an order permitting Staff Witness Mark Davis to appear remotely at the hearing in the above captioned case, and to establish a Webex connection set for Mr. Davis's scheduled testimony on Thursday, June 16, 2022, to accommodate such appearance.

Respectfully submitted,

/s/ Curt Stokes

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**Counsel for Staff of the
Missouri Public Service Commission**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 9th day of June, 2022, to all parties and/or counsels of records.

/s/ Curt Stokes
Curt Stokes