

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

In the Matter of the 2023 RES Compliance Report and    )  
2024 Compliance Plan of The Empire District Electric    ) **File No. EA-2025-0287**  
Company d/b/a Liberty                                                    )

**STAFF'S REPORT AND REQUEST FOR EXTENSION**

**COMES NOW** the Staff of the Missouri Public Service Commission ("Staff"), by and through counsel, and for its Staff Report, states as follows:

1. On April 15, 2025, The Empire District Electric Company d/b/a Liberty ("Liberty") filed its Renewable Energy Standard (RES) 2024 RES Compliance Report ("Report") and its Compliance Plan ("Plan") for calendar years 2025 through 2027 as required by Commission rule 20 CSR 4240-20.100(8).

2. Commission rule 20 CSR 4240-20.100(8)(D) requires Staff to review Liberty's Compliance Plan and Compliance Report and file a Staff report within 45 days of their filing.

**I. The Report**

3. While reviewing Liberty's RES Compliance Report, Staff identified potential concerns and would like to discuss with the Company prior to finalizing its report. Staff reached out to Liberty, and the company agreed to an extension.

4. Staff respectfully requests a five (5) day variance from the 45-day deadline, pursuant to 20 CSR 4240-2.205,<sup>1</sup> to complete its inquiry and incorporate Liberty's response into its report. Good cause exists for this variance because this brief extension

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<sup>1</sup> The commission may grant **variance** from or waive any rule or provision of a rule promulgated by the commission upon a finding of good cause.

will allow Staff to prepare a thorough and accurate report for the Commission's consideration. No party will be unduly prejudiced by this request.

## **II. The Plan**

5. Commission rule 20 CSR 4240-20.100(8)(B)1.A. through G. establishes fundamental standards for RES Compliance Plans.

6. As discussed in greater detail in Staff's Memorandum, attached and incorporated herein as Attachment A, Staff did not identify any deficiencies with Liberty's Plan.

7. Staff has not made a ratemaking determination as to whether the Plan is the least expensive or prudent method for complying with the RES. Staff recommends that the Commission be explicit in any *Order* it may issue in this case that it is not making a ratemaking determination.

**WHEREFORE**, Staff tenders its review of Liberty's 2025 through 2027 RES Compliance Plan, respectfully requests that the Commission grant Staff's an additional five (5) days to review Liberty's RES Compliance Report, and for such other and further relief and orders as the Commission may deem necessary or appropriate.

Respectfully submitted,

**/s/ Eric Vandergriff**

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Staff Counsel for the  
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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 30<sup>th</sup> day of May 2025.

**/s/ Eric Vandergriff**