

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

In the Matter of The Empire District Electric)	
Company's Submission of Its Interim Report)	Case No. EO-2012-0269
Regarding Participation in the Southwest)	
Power Pool, Inc.)	

MOTION FOR EXTENSION OF TIME

Comes now, the Office of the Public Counsel (the "OPC") and the Staff of the Public Service Commission of the State of Missouri ("Staff" and "Commission," respectively) and respectfully request that the Commission extend the time to respond to The Empire District Electric Company d/b/a Liberty's ("Liberty") Motion for Continuation of Conditional Approval (the "Motion," Doc. 41). In support, the OPC and Staff state as follows:

1. On July 28, 2025, Liberty filed the Motion requesting that the Commission extend its interim and conditional approval of Liberty's membership in the Southwest Power Pool ("SPP"). (Doc. 41). Liberty "recommends an extension of interim approval until all transmission facilities identified in the 2024 ITP^[1] are placed into service." (Mot. 6).
2. On that same day, the Commission issued an Order stating that "[a]ny party wishing to respond shall do so no later than August 11, 2025." (Order Directing Filing 1, Doc. 42).
3. Since approximately July 2006, the Commission has granted Liberty interim and conditional approval to participate in the SPP. (*See, e.g.*, Am. Order Approving Stip. & Agreement, Doc. 41, Case. No. EO-2006-0141). This approval has been extended on several occasions. (*See* Order Granting Mot. for Approval of

¹ The 2024 ITP refers to SPP's Integrated Transmission Plan 2024. (Mot. 4). The OPC believes this document can be found here: <https://www.spp.org/media/2229/2024-itp-assessment-report-v10.pdf>.

Unanimous Stip. & Agreement, Doc. 20 (extending conditional approval until August 1, 2019); Order Modifying Stip. & Agreement, Doc. 26 (extending conditional approval until August 1, 2022); Order Granting Mot. for Extension of Conditional Approval of Membership in the SPP, Doc. 35 (extending conditional approval until August 1, 2024); Order Granting Mot. for Extension of Conditional Approval of Membership in the SPP, Doc. 39 (extending conditional approval until August 1, 2025)).

4. On July 31, 2025, the Commission granted the OPC's request and extended Liberty's interim and conditional approval, with the same terms and conditions as previously ordered, until October 1, 2025. (Order Granting Approval 2, Doc. 47). In that Order, the Commission directed that "[a]ny party wishing to respond to Liberty's original motion for a continuance of its SPP membership until all transmission facilities in the 2024 ITP are placed into service shall do so no later than August 20, 2025." (*Id.*)
5. The OPC and Staff are concerned about the length of the extension Liberty seeks in the Motion, especially because it is not tied to a specific date.² Though the OPC and Staff have preliminarily discussed their positions, they would like to continue those discussions. Given the press of other business, the OPC and Staff have not yet had an opportunity to do so.

² Liberty requests that the Commission extend the Interim Period "until all transmission facilities identified in the 2024 ITP are placed into service." (Mot. 6). Liberty does not identify the target date for the completion of these transmission facilities. (*See generally* Mot.). Based on information the SPP presented to the Commission in November 2024, it appears that the in-service date for just the Missouri projects extends into at least January 2036. (Nov. 6, 2024 SPP Quarterly RTO Status Update, slides 34-35, available at: <https://psc.mo.gov/CMSInternetData/Agenda%20Presentations/2024%20Presentations/11-06-2024%20SPP%20Status%20Update.pdf>).

6. To allow all parties additional time to review Liberty's Motion, consider the circumstances surrounding the relief requested, and to formulate a response, the OPC and Staff request that the Commission extend the time to respond to Liberty's Motion until September 12, 2025.

WHEREFORE, the OPC and Staff respectfully request that the Commission extend the time to respond to Liberty's Motion until September 12, 2025.

Respectfully submitted,

/s/ Tracy D. Johnson

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CERTIFICATE OF SERVICE

I hereby certify that copies of the forgoing will be emailed to all counsel of record this 20th day of August 2025.

/s/ Lindsay VanGerpen