BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

)

)

In the Matter of the 2022 RES Compliance Report) And 2023 RES Compliance Plan of The Empire District Electric Company d/b/a Liberty

Case No. EO-2023-0358

MOTION FOR EXTENSION

COMES NOW The Empire District Electric Company d/b/a Liberty ("Liberty" or the "Company"), and for its Motion for Extension regarding the due date for the filing of a recommendation and comments by the Staff of the Commission ("Staff") and the Office of Public Counsel ("OPC"), respectfully states as follows:

1. On April 14, 2023, Liberty filed its 2022 Renewable Energy Standard ("RES") Compliance Report and its 2023-2025 RES Compliance Plan with the Commission pursuant to Commission Rule 20 CSR 4240-20.100(8). The Commission ordered Staff to review the Report and Plan and file a report.

2. As a result of discussions among the parties and to correct and clarify certain information, Liberty filed a revised Report and Plan on May 24, 2023.

3. On May 26, 2023, Staff filed a Motion for Extension to file their report requesting an extension until June 23, 2023. OPC also requested an extension of time to file comments regarding Liberty's Revised Report and Plan. Both extensions were granted by the Commission.

4. Contemplating the submission of a second revised filing from Liberty, on June 23, 2023, Staff and OPC filed a Joint Request for an Extension of Time to file comments and recommendations requesting an extension until August 7, 2023. The Commission granted the request on June 26, 2023.

1

5. The parties have continued to discuss Liberty's filings. At this time, Liberty is submitting a revised RES Compliance Report and Plan in public and confidential versions. Changes were made as set forth below.

2022 RES Report:

- Table 2, page 5
- Table 3, page 5
- Updated Section 1 E, F page 6
- Table 4, page 7
- Corrected Section 1G page 7
- Updated wording in Section 1P page 9
- Updated Attachment 1
- Updated Attachment 5
- Updated Attachment 2

RES Compliance Plan:

- Updated Table 2, page 6
- Updated Table 3, page 8
- Edited Section 1 F, page 9

6. To provide sufficient time for Staff and OPC to review Liberty's revised RES

Compliance Plan and Report, Liberty requests an additional 10-day extension for Staff and OPC

to file comments and recommendations.

WHEREFORE, Liberty respectfully submits this Motion for Extension and requests such

relief as is just and reasonable under the circumstances.

Respectfully submitted,

<u>/s/ Diana C. Carter</u> Diana C. Carter MBE #50527 428 E. Capitol Ave., Suite 303 Jefferson City, Missouri 65101 Joplin Office Phone: (417) 626-5976 Cell Phone: (573) 289-1961 E-Mail: Diana.Carter@LibertyUtilities.com

CERTIFICATE OF SERVICE

I hereby certify that the above document was filed in EFIS on this 4th day of August, 2023, and sent by electronic transmission to all counsel of record.

/s/ Diana C. Carter