

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

In the Matter of the Tariff Filing of	)	
The Empire District Electric Company to	)	
Implement a General Rate Increase for	)	<u>Case No. ER-2004-0570</u>
Retail Electric Service Provided to	)	Tariff File No. YE-2004-1324
Customers in its Missouri Service Area.	)	

**MOTION FOR EXTENTION OF TIME**

COMES NOW The Empire District Electric Company (“Empire”), by counsel, and for its Motion For Extension of Time, respectfully states as follows to the Missouri Public Service Commission (“Commission”):

1. On December 20, 2004 the Commission by delegation order issued its *Order Directing Filing* in which it directed the Commission Staff, and if they so desired the other parties, to file, not later than 4:00 p.m. Thursday, December 30, 2004 certain “scenarios” respecting Empire’s fuel and purchased power expense.

2. Preparing the particular information requested by the Commission will take Empire some time to complete and review prior to filing. In this regard, several key Empire personnel, whose input will be necessary to prepare the requested fuel model runs and review the filing on behalf of Empire, are not available prior to December 30, 2004 due to the intervening holiday. However, Empire anticipates it could provide a response to the Commission’s *Order* including the requested fuel and purchased power expense information if given until Monday, January 10, 2005 to make said filing.

3. With respect to the Staff’s own filing, Empire anticipates that discussions between the Staff and Empire personnel on certain aspects of the Staff fuel runs necessarily will be required. The December 30, 2004 deadline, therefore, is additionally problematic.

4. Given that the evidentiary hearing in this case was just adjourned last week and the January 10, 2005 date would constitute only an eleven (11) day extension (with one day being a state holiday), no party nor the Commission should be inconvenienced or harmed by extending the time for the parties to respond to the Commission's *Order* to January 10, 2005.

WHEREFORE, Empire respectfully moves the Commission to extend the time for the parties to respond to the Commission's December 20, 2004 *Order* eleven (11) days from Thursday, December 30, 2004 to January 10, 2005.

Respectfully submitted,

**/s/ Charles Brent Stewart**

---

Charles Brent Stewart, MoBar#34885  
STEWART & KEEVIL, L.L.C.  
4603 John Garry Drive, Suite 11  
Columbia, Missouri 65203  
(573) 499-0635  
(573) 499-0638 (fax)  
[Stewart499@aol.com](mailto:Stewart499@aol.com)

CO-COUNSEL FOR THE EMPIRE  
DISTRICT ELECTRIC COMPANY

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing Motion For Extension of Time was served on counsel for all parties of record in Case No. ER-2004-0570 via electronic mail this 21<sup>st</sup> day of December, 2004.

**/s/ Charles Brent Stewart**

---