

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

In the Matter of the Application of White River Valley Electric       )  
Cooperative, Inc.'s Approval of a Change of Electric Supplier for    ) Case No. EO-2022-0249  
Elevate Branson in Taney County, Missouri                               )

**RESPONSE TO APPLICATION AND ORDER DIRECTING FILING**

COMES NOW The Empire District Electric Company d/b/a Liberty, and for its initial response to the Application of White River Valley Electric Cooperative, Inc. ("White River"), respectfully states as follows to the Missouri Public Service Commission (the "Commission"):

1. On March 18, 2022, White River filed an application with the Commission requesting approval as electric supplier for a soon-to-be-developed vacant lot owned by Elevate Branson, a non-profit entity with its principal place of business in Branson. Both White River and Liberty currently provide electric service to the area.

2. On March 21, 2022, the Commission issued its *Order Adding Party and Directing Responses to Application* by which the Commission made Liberty a party to the proceeding, directed Liberty to file a response to White River's application by April 20, 2022, and directed the Staff of the Commission to file a recommendation regarding the application or a status report by May 5, 2022.

3. Liberty and White River have engaged in discussions regarding this matter and will be able to reach an amicable resolution that serves the public interest. In this regard, Liberty requests an additional thirty days to work with White River and submit a settlement agreement herein. A thirty day extension of time is also requested regarding the due date for Staff's submission of a recommendation or status report.

4. White River, the Office of the Public Counsel, and the Staff of the Commission consent to this request for additional time.

WHEREFORE, Liberty respectfully submits this Initial Response to Application and Order Directing Filing and requests additional time for Liberty and White River to reach a solution of this matter. Liberty seeks such additional relief as is just and proper under the circumstances.

Respectfully submitted,

/s/ Diana C. Carter

Diana C. Carter MBE #50527

The Empire District Electric Company d/b/a Liberty

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 20<sup>th</sup> day of April, 2022, with notification of the same being sent to all counsel of record. This Notice was also sent by electronic transmission to all counsel of record.

/s/ Diana C. Carter