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October 1, 2010

Mr. Steven Reed, Secretary
Missouri Public Service Commission
200 Madison Street
Jefferson City, MO 65102-0360

RE: Case No. EW-2011-0031

Dear Mr. Reed:

In response to the Missouri Public Service Commission's ("Commission") August 5, 2010, letter opening this workshop docket and directing interested parties to respond to specific questions posed by the Commission, The Empire District Electric Company ("Empire" or "Company") hereby provides notice of its intent to adopt and endorse the comments and responses filed this date by the Missouri Energy Development Association ("MEDA") on behalf of its member companies.

Although it concurs with the comments and responses filed by MEDA, Empire wishes to provide brief additional comments on one point: the implications of any requirement that would allow electric energy purchased to comply with Missouri's RES to come from a generating source located outside the state only if a utility can prove the energy is sold to its Missouri customers.

As Empire pointed out in written comments submitted in Case No. EX-2010-0169, electrons generated using renewable resources are indistinguishable from all other electrons once those electrons enter the transmission network. Consequently, there is no way to prove that energy actually consumed in Missouri came from a renewable source – and that is true regardless of whether the renewable source is located inside or outside Missouri. For energy generated from facilities located within the state, the Commission has been willing to presume for purposes of complying with the RES that all of the energy generated by those facilities was delivered to and consumed by Missouri consumers. Some similar presumption – whether based on an allocation formula or some other apportionment methodology – also needs to be adopted for energy purchased from renewable resources located outside Missouri. Otherwise no Missouri utility will

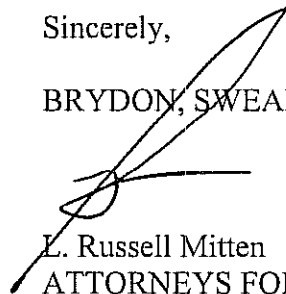
be able to meet the proof standard that is prerequisite to counting such energy toward satisfaction of the requirements of the RES.

Empire thanks the Commission for this opportunity to submit these comments and looks forward to participating in this workshop docket with other interested parties. If the Commission has any questions regarding these comments, please contact the undersigned

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:

A handwritten signature in black ink, appearing to read "L. Russell Mitten", is written over the printed name and firm name.

L. Russell Mitten
ATTORNEYS FOR
THE EMPIRE DISTRICT ELECTRIC COMPANY