

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

In the Matter of Staff's Audit of The Empire)
District Electric Company's Expenditures)
Related to the Asbury Environmental Retrofit)
Project.)

Case No. **EO-2014-**_____

MOTION TO OPEN DOCKET

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission") and for its *Motion to Open Docket* states as follows:

1. The Empire District Electric Company ("Empire") is the owner and operator of the Asbury Generating Station ("Asbury"). Empire has undertaken the construction of an Air Quality Control System (AQCS) at Asbury.

2. In documents Empire has provided to date, Empire refers to the construction of the AQCS as the Asbury Environmental Retrofit Project (AERP).

The major AQCS components included in the AERP are as follows:

- a. Circulating Dry Scrubber for SO₂ control,
- b. Pulse Jet Fabric Filter for particulate matter control,
- c. Powder Activated Carbon Injection for mercury control,
- d. Draft equipment upgrades, and
- e. New chimney.

3. Staff requests that the Commission open this docket to facilitate and retain discovery related to Staff's audit of the AERP.

4. Staff anticipates that any disputes related to the level of Empire's prudent investment in the AERP would be made in the general rate case where Empire seeks to include its AERP investment in rate base, and not in this docket.

WHEREFORE, Staff respectfully requests that the Commission open a docket to facilitate and retain discovery related to Staff's audit of Empire's investment in Air Quality Control Components at its Asbury Generating Station.

Respectfully submitted,

/s/ Sarah Kliethermes

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 20th day of August, 2013.

/s/ Sarah Kliethermes