

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

In the Matter of The Empire District Electric)	
Company's 2013 Triennial Compliance)	<u>File No. EO-2013-0547</u>
Filing Pursuant to 4 CSR 240-22)	

JOINT REQUEST FOR LEAVE TO FILE COMMENTS ON DECEMBER 2, 2013

COMES NOW, the Staff of the Missouri Public Service Commission ("Staff") (by and through the Staff Counsel's Office), the Missouri Division of Energy ("MDOE" formerly the Department of Natural Resources), the Office of the Public Counsel ("Public Counsel"), Dogwood Energy, LLC ("Dogwood"), and Midwest Energy Users' Association ("MEUA"), and file this Joint Request For Leave To File Comments On December 2, 2013. In support thereof, the joint movants state as follows:

1. On July 1, 2013 The Empire District Electric Company ("Empire") filed its most current Chapter 22 Electric Resource Planning triennial compliance filing. Pursuant to Rule 4 CSR 240-22.080(7), the Staff has "within one hundred fifty (150) days" of July 1, 2013 to file a report, and pursuant to Rule 4 CSR 240-22.080(8) Public Counsel and other parties have "within one hundred fifty (150) days" of July 1, 2013 to file a report or comments.

2. One hundred fifty (150) days ends on Thanksgiving Day, November 28, 2013. The Staff, MDOE, the Public Counsel, Dogwood, and MEUA read the Commission's Rule 4CSR 240-2.050(1) Computation of Time as extending the filing period to the next non-holiday, non-Saturday, and non-Sunday, which would be Monday, December 2, 2013.

3. Out of caution, the Staff, MDOE, the Public Counsel, Dogwood, and MEUA are requesting leave to file on Monday, December 2, 2013 their reports and/or comments in response to Empire's Chapter 22 triennial compliance filing.

4. The Staff, MDOE, the Public Counsel, Dogwood and MEUA are not making this request to unduly delay the proceedings in this case.

5. Undersigned counsel for the Staff has spoken with Counsel for Empire, Mr. Dean Cooper, and he has indicated that undersigned counsel may indicate that Empire has no objection to a December 2, 2013 filing of reports and/or comments in response to Empire's July 1, 2013 Chapter 22 triennial compliance filing. Undersigned counsel has spoken with Counsel for those intervenors which have not joined this pleading and they have related that undersigned counsel may indicate that they have no objection to joint movants' request.

WHEREFORE, the Staff, MDOE, the Public Counsel, Dogwood, and MEUA out of a cautious approach/reading to the Commission's rules are requesting leave to file on Monday, December 2, 2013 their reports and/or comments in response to Empire's Chapter 22 triennial compliance filing made on July 1, 2013.

Respectfully submitted,

/s/ Jeremy D. Knee

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing *Joint Request For Leave To File Comments On December 2, 2013* have been transmitted electronically to all counsel of record this 26th day of November, 2013.

/s/ Steven Dottheim