

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Petition of The Empire)
District Electric Company for Approval of Its) Docket No. 18-EPDE-184-PRE
Customer Savings Plan)

**MOTION TO EXTEND 180-DAY DEADLINE
UNDER K.S.A. 66-1239 AND
MOTION FOR PROCEDURAL SCHEDULE**

The Empire District Electric Company ("Empire" or "Company") respectfully requests approval of the following proposed procedural schedule:

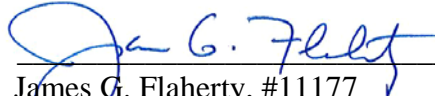
<u>Date</u>	<u>Event</u>
Wed., October 31, 2017	Filing Date
Thur., February 22, 2018	Staff/Intervenor testimony due
Mon., March 5, 2018	Staff/Intervenor cross answering testimony
Thur., March 15, 2018	Empire Rebuttal Testimony due
Thur., March 22, 2018	Settlement Conference
Fri., March 30, 2018	Settlement/ Testimony in Support or in Opposition to Settlement due
Mon., April 2, 2018	List of Contested Issues/ Discovery Cut-Off Date/ Pretrial Motions if no unanimous settlement
Tues., April 3, 2018	Prehearing Conference
Tues-Thur., April 10-12, 2018	Evidentiary Hearing or Hearing on Settlement
Thur., May 15, 2018	Simultaneous Post-hearing briefs
Thur., June 15, 2018	Order due

1. This schedule is being proposed in conjunction with the Application filed in this matter. As explained in detail in the Application and the associated direct testimony, Empire seeks the issuance of an Order in this case that is effective by June 15, 2018, so that Empire has the potential to take advantage of a limited window of opportunity to bring identified savings to customers through its Customer Savings Plan.

2. In conjunction with its request for an Order adopting the above procedural schedule

in this docket, Empire agrees to an extension of the 180-day deadline set forth in K.S.A. 66-1239, to June 15, 2017.

WHEREFORE, Empire requests the Commission issue an Order approving the above procedural schedule in this docket.



James G. Flaherty, #11177
ANDERSON & BYRD, LLP
216 S. Hickory ~ P. O. Box 17
Ottawa, Kansas 66067
(785) 242-1234, telephone
(785) 242-1279, facsimile
jflaherty@andersonbyrd.com

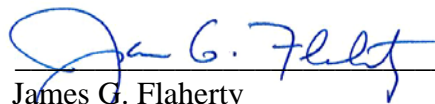
Sarah Knowlton, NH #12891
Senior Director, Regulatory Counsel
Liberty Utilities
15 Buttrick Rd.
Londonderry, NH 03053
p: 603-216-3654
e: sarah.knowlton@libertyutilities.com

Attorneys for The Empire District Electric Company

VERIFICATION

STATE OF KANSAS, COUNTY OF FRANKLIN, ss:

James G. Flaherty, of lawful age, being duly sworn upon oath, deposes and says that he is attorney for The Empire District Electric Company, above named, that he has read the above and foregoing Motion to Extend 180-Day Deadline under K.S.A. 66-1239 and Motion for Procedural Schedule, and the statements contained therein are true.



James G. Flaherty

SUBSCRIBED AND SWORN to before me this 1st day of November, 2017.





Notary Public

Appointment/Commission Expires:

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was sent via U. S. Mail, postage prepaid, hand-delivery, or electronically, this 1st day of November, 2017, addressed to:

Stephan Skepnek
s.skepnek@kcc.ks.gov

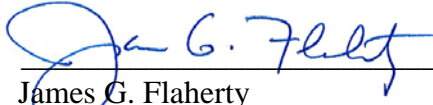
David W. Nickel
d.nickel@curb.kansas.gov

Thomas J. Connors
tj.connors@curb.kansas.gov

Todd E. Love
t.love@curb.kansas.gov

Shonda Smith
sd.smith@curb.kansas.gov

Della Smith
d.smith@curb.kansas.gov



James G. Flaherty