

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

In the Matter of The Empire District Gas)	
Company's d/b/a Liberty Request to File)	
Tariffs to Change its Rates for Natural Gas)	File No. GR-2021-0320
Service)	

APPLICATION TO INTERVENE BY
SYMMETRY ENERGY SOLUTIONS, LLC

COMES NOW Symmetry Energy Solutions, LLC (“Symmetry”), by and through counsel, pursuant to Missouri Public Service Commission (“Commission”) rule 20 CSR 4240-2.075, and files its Application to Intervene in the referenced case. In support thereof, Symmetry states as follows:

1. On August 23, 2021, The Empire District Gas Company, a Liberty Utilities Company (“EDG”) filed tariffs designed to increase the natural gas rates to customers served in its Missouri service area.
2. On August 24, 2021, the Commission issued its *Order Giving Notice, Setting a Deadline to Intervene, Setting a Deadline to Respond to the Test Year, and Directing a Proposed Schedule*, which set an intervention deadline of September 27, 2021.
3. Symmetry sells natural gas to customers who are on the EDG system pursuant to EDG’s transportation tariff.
4. EDG has proposed changes to its transportation tariff that will impact Symmetry and Symmetry’s customers.
5. Symmetry’s interest is different than those of the general public, and may be adversely affected by a final order from this Commission in this case. Symmetry wishes to

ensure that both it and its customers' interests in affordable and reliable natural gas are preserved for the future, that Symmetry has the ability to appropriately plan for the future, and that Symmetry is not disadvantaged or otherwise economically disadvantaged by EDG's current request. Such interests are not currently represented at this time.

6. Symmetry expects to develop its position on specific issues as the case develops, and takes no position on the filing at this time.

7. Granting intervention to Symmetry would serve the public interest by allowing Symmetry to examine these issues that are significant from a policy and public interest from its unique perspective.

8. Pleadings, notices and other correspondence in this case should be directed to undersigned counsel.

WHEREFORE, Symmetry prays that this Commission issue an order granting its application to intervene in this proceeding and for such other orders and relief as may be appropriate in the circumstances.

Respectfully Submitted,

By: /s/ Douglas L. Healy

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**ATTORNEYS FOR SYMMETRY
ENERGY SOLUTIONS, LLC**

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 17th day of September, 2021.

/s/ Douglas L. Healy