

(e.g., in a rate case, a complaint case, a case involving an application seeking specific relief), but this is not such a case because, as noted, it is not a case at all. As the Commission also indicated in the above-referenced order denying MECG's intervention, if such a case does arise relating to the subject matter of this investigatory docket, "MECG [MIEC here] may be able to show grounds for intervention in such action." *Id.* But that case does not exist today. Intervention in this docket is therefore improper.

WHEREFORE, since there is no case in which intervention would be proper, and since the Staff's investigation properly protects the public interest, MIEC's Application for Intervention should be denied.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served on the Missouri Public Service Commission Staff and the Office of the Public Counsel via electronic mail (e-mail) or via regular mail on this 31st day of March, 2022.

/s/James B. Lowery
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