

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

In the Matter of The Empire District Electric)
Company of Joplin, Missouri for Authority to)
File Tariffs Increasing Rates for Electric) Case No. ER-2012-0345
Service Provided to Customers in the Missouri)
Service Area of the Company)

**MIDWEST ENERGY CONSUMER GROUP'S
STATEMENT OF POSITION**

COMES NOW the Midwest Energy Consumer Group (“MECG”) and for its Statement of Position on the Issues associated with Empire’s request for Interim Rate Relief respectfully states as follows:

1. Is Empire facing a financial emergency or near emergency that warrants the Commission authorizing it to implement an interim-subject-to-refund rate increase pending implementation of final general rates in this case?

Response: No

2. Do Empire’s tornado recovery costs and post-tornado cost of service due to the May 2011 Joplin tornado warrant the Commission authorizing it to implement an interim subject-to-refund rate increase pending implementation of final general rates in this case?

Response: No

3. Is there any other basis(es) that warrants the Commission authorizing Empire to implement an interim-subject-to-refund rate increase pending implementation of final general rates in this case?

Response: No

4. If the answer to 1, 2 or 3 is “yes,” what should be the amount of the interim-subject to-refund rate increase, and what conditions, if any, should the Commission impose on it?

Response: Not applicable. The Commission should not permit interim rate relief.

WHEREFORE, MECG respectfully requests that the Commission deny Empire’s request for interim rate relief.

Respectfully submitted,



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ATTORNEY FOR THE MIDWEST ENERGY
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by email, facsimile or First Class United States Mail to all parties by their attorneys of record as provided by the Secretary of the Commission.



David L. Woodsmall

Dated: September 4, 2012