

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

In the Matter of the Petition of The Empire)
District Electric Company d/b/a Liberty to)
Obtain a Financing Order that Authorizes) Case No. EO-2022-0040
the Issuance of Securitized Utility Tariff)
Bonds for Qualified Extraordinary Costs)

**APPLICATION TO INTERVENE OF THE
MIDWEST ENERGY CONSUMERS GROUP**

COMES NOW the Midwest Energy Consumers Group (“MECG”), pursuant to 20 CSR 4240-2.075 of the Missouri Public Service Commission’s Rules of Practice and Procedure, and for its Application to Intervene respectfully states as follows:

1. The Midwest Energy Consumers Group is an incorporated association representing the interests of large commercial and industrial users of electricity.

2. On January 19, 2022, The Empire District Electric Company d/b/a Liberty (Liberty) submitted a verified petition for a financing order, seeking authority to issue securitized utility tariff bonds regarding the extraordinary costs incurred by Liberty on behalf of its customers during the anomalous weather event of February 2021 (“Winterstorm Uri”).

3. The matters to be considered in this case and the Commission’s determinations thereon, could have a direct and significant impact on the cost of electric service of the large commercial and industrial customers represented by MECG. Therefore, granting this proposed intervention to the Applicant would serve the public interest and would assist the Commission in development of a more complete record.

3. As a representative of large user customers of Empire, the Applicant has a direct and immediate interest in these proceedings that is different from that of the

general public. While Applicant does not at this time have sufficient information to assert a position on this investigation, they reserve the right to assert positions after they have had an adequate opportunity to examine the record, and any documentation of other parties filed herein.

4. Correspondence and communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

David L. Woodsmall
Woodsmall Law Office
308 East High Street, Suite 204
Jefferson City, MO 65101

WHEREFORE, having stated the grounds for intervention and the position and interest of the Applicant in these proceedings, Applicant asks that the Commission grant this Application for Intervention, and thereby entitle said Applicant to have notice of and to appear at the taking of testimony, to produce and cross-examine witnesses, and to be heard through counsel on the argument, and in all other respects to be made parties to this proceeding.

Respectfully submitted,

/s/ David Woodsmall

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ATTORNEY FOR THE MIDWEST
ENERGY CONSUMERS GROUP

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: February 4, 2022