

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

In the Matter of the Application of The)	
Empire District Electric Company d/b/a)	
Liberty to Implement Robust and Mutually)	Case No. EO-2022-0078
Beneficial Energy Efficiency Offerings)	
Under the Framework Prescribed by)	
MEEIA)	

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

COMES NOW the Midwest Energy Consumers Group (“Applicant” or “MECG”), pursuant to 20 CSR 4240-2.075 of the Missouri Public Service Commission’s Rules of Practice and Procedure, and the Commission’s September 17, 2021 *Order Directing Notice and Establishing Intervention Deadline*, 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 September 15, 2021, the Empire District Electric Company d/b/a Liberty filed tariff sheets and an application seeking the Commission’s approval to establish a Demand Site Investment Mechanism (DSIM).
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 energy service for commercial and industrial customers that are not capable of opting out of such programs and costs. 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.

4. 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, it reserves the right to assert positions after it has had an adequate opportunity to examine the record, and any documentation of other parties filed herein.

5. 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 grounds for intervention and the interest of the Applicant in these proceedings, Applicant asks that the Commission grant this Application for Intervention, and allow Applicant 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 a party to this proceeding.

Respectfully submitted,

/s/ David Woodsmall
David L. Woodsmall, MBE #40747
308 East High Street, Suite 204
Jefferson City, Missouri 65101
(573) 797-0005 (telephone)
david.woodsmall@woodsmalllaw.com

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.

A handwritten signature in black ink, appearing to read "David L. Woodsmall". The signature is written in a cursive style with a large initial "D".

David L. Woodsmall

Dated: September 20, 2022