

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

In the Matter of the Application of The)
Empire District Electric Company for)
Certificates of Convenience and Necessity) File No. EA-2019-0010
Related to Wind Generation Facilities.)

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

COMES NOW the Midwest Energy Consumers Group (“Applicant” or “MECG”), pursuant to 4 CSR 240-2.075 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 users of electricity including customers taking service from Empire District Electric Company (“Empire”).

2. The matters to be considered in this case and the Commission’s determinations therein, could have a direct and significant impact on customers’ cost of electric service and the manner in which it is supplied. Therefore, the Applicant has a direct and immediate interest in this proceeding that is different from that of the general public. Indeed, MECG has been granted intervention in numerous Empire matters including rate cases, IRP proceedings and Empire’s pending Cost Allocation Manual docket.

3. MECG was a party to the recent Empire docket which considered the addition of wind generation and the potential benefits for customers. In that docket, MECG filed testimony and presented evidence for the Commission’s consideration.

Therefore, granting this proposed intervention to the Applicant should assist the Commission in development of a more complete record.

4. 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:

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WHEREFORE, having stated the grounds for intervention and the position and interest of the Applicant in this proceeding, 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 in person or by counsel on the argument, and in all other respects to be made parties to this proceeding.

Respectfully submitted,



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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: October 19, 2018