

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

In the Matter of the Requests for Customer                    )  
Account Data Production    )        Case No. EO-2024-0002

**LIBERTY’S APPLICATION TO INTERVENE**

COMES NOW The Empire District Electric Company d/b/a Liberty, and pursuant to 20 CSR 4240-2.075 and the Commission’s *Order Directing Notice, Setting Deadline for Intervention Requests, and Setting Prehearing Conference* issued July 6, 2023 in the above-captioned case (the “*Order*”), hereby files this Application to Intervene. In support thereof, Liberty states as follows:

1.       On June 30, 2023, Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“EMM”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“EMW”) (collectively, “Evergy”) filed a Motion to Establish Docket for Further Consideration of Data Production (“Evergy’s Motion”). In Evergy’s Motion, it was noted that many aspects of the data ordered for an Ameren Missouri study are similar to the data requested by Staff from Evergy and that Evergy believes “it would be more efficient to include Ameren Missouri in the requested EODocket so that the Commission and Staff can address the issue of data availability in one proceeding.” Evergy also noted that “Liberty recognizes the need to understand and resolve the issue of data availability as it relates to collecting similar customer-specific information in the future.”

2.       Noting the intended participation of Ameren Missouri and Liberty in this docket, on July 6, 2023, the Commission issued its Order directing any person wishing to intervene to file an application no later than July 27, 2023.

3.       Liberty is a Kansas corporation, in good standing in all respects, with its principal office and place of business at 602 Joplin Street, Joplin, Missouri. Liberty is qualified to conduct business and is conducting business in Missouri, as well as in the states of Arkansas, Kansas, and

Oklahoma. Liberty is engaged, generally, in the business of generating, purchasing, transmitting, distributing, and selling electricity. A certified copy of Liberty's Restated Articles of Incorporation, as amended, was filed in Case No. EF-94-39, and a certificate from the Missouri Secretary of State that Liberty, a foreign corporation, is authorized to do business in Missouri was filed with the Commission in Case No. EM-2000-369. This information is current and correct, and the referenced documents are incorporated herein by reference.

4. Commission Rule 20 CSR 4240-2.075 provides that the Commission may grant a motion to intervene if (a) the proposed intervenor "has an interest which is different from that of the general public and which may be adversely affected by a final order arising from the case" or (b) granting the proposed intervention would serve the public interest.

5. As one of the three investor-owned electric utilities regulated by the Commission, Liberty's interests are different than the interests of the general public. Considering the Commission's focus on consistency among the utilities and the common characteristics among investor-owned electric utilities, Liberty's interests may be adversely affected by a final order arising from this case.

6. Additionally, granting Liberty's intervention would serve the public interest. Given the similar nature of the data being requested by Staff, it will promote administrative economy and preserve the scarce resources of the Commission, Staff, Public Counsel, other interested parties if all the affected regulated electric companies are allowed to participate in one proceeding.

7. Regarding the rule requirement to provide a statement as to whether the proposed intervenor "supports or opposes the relief sought or that the proposed intervenor or new member is unsure of the position it will take," Liberty notes that at this early juncture of the case, it is

unclear what structure the case will take and what relief will be requested. As such, Liberty is unsure of the positions it will take in this docket.

WHEREFORE, Liberty respectfully requests that the Commission grant its Application to Intervene and that it be made a party hereto with all rights to participate in this matter.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that the above document was filed in EFIS on this 26th day of July, 2023, with notification of the same sent to all counsel of record.

/s/ Diana C. Carter