

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

In the Matter of Empire District Electric Company's)
2010 Utility Resource Filing Pursuant to CSR 240-22) **Case No. EO-2011-0066**

**MISSOURI DEPARTMENT OF NATURAL RESOURCES'
APPLICATION TO INTERVENE**

COMES NOW Missouri Department of Natural Resources (MDNR) and, pursuant to Commission Rule 4 CSR 240-2.075, respectfully requests that the Commission issue its order granting MDNR's Application to Intervene. For its Application, MDNR states as follows:

1. On September 3, 2010, Empire District Electric Company ("Empire") filed its 2010 Integrated Resource Planning Filing ("IRP"), with the Missouri Public Service Commission. The Commission issued an *Order Directing Notice, Setting Intervention Deadline, Directing Filing and Scheduling a Conference* on September 8, 2010. In its September 8, 2010, Order, the Commission established an intervention deadline of September 15, 2010.
2. MDNR, and specifically its Division of Energy, is a state agency vested with the powers and duties set forth in Section 640.150, RSMo.
3. MDNR has an interest different than that of the general public, and its intervention will serve a public interest in that the Division of Energy will be looking at the proposed filing from a formal policy and planning perspective as well as looking at the potential impacts on environmental quality. The Division of Energy's review also will be in relation to the mandate set forth in Section 640.150, RSMo. which includes planning for energy resource development; analyzing energy management issues; consulting and

cooperating with all state and federal governmental agencies on matters of energy research and development, management, conservation and distribution; assessing the potential impacts on environmental quality; and analyzing the potential for increased use of energy alternatives and making recommendations for the expanded use of such alternate energy sources and technologies.

4. Communications, correspondence, orders and decision in this matter should be addressed to:

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with a copy to:

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5. MDNR is uncertain at this time of the position it will take regarding the relief sought by Empire in this case.

WHEREFORE, the Missouri Department of Natural Resources respectfully requests that it be allowed to intervene in the above-styled matter.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 15th day of September, 2010.

/s/ Sarah Mangelsdorf
Sarah Mangelsdorf