

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

In the Matter of The Empire District)
Electric Company’s Request for Authority)
to File Tariffs Increasing Rates for Electric) Case No. ER-2019-0374
Service Provided to Customers in its)
Missouri Service Area)

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

COMES NOW the Midwest Energy Consumers Group (“Applicants” 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 entity representing the interests of large users of electricity.
2. On August 14, 2019, The Empire District Electric Company (“Empire”) filed tariffs designed to increase the electric rates to customers served in its Missouri service area.
3. The matters to be considered in this case and the Commission’s determinations therein, could have a direct and significant impact on the electric rates and the manner in which service is supplied to large electric consumers. Therefore, granting this proposed intervention to the Applicants would serve the public interest and would assist the Commission in development of a more complete record. Indeed, the Commission has granted Applicant’s intervention in numerous previous dockets involving Empire including rate case, the recent Customer Savings Plan docket, the

recent wind case involving certificates of convenience and necessity and the pending cost allocation manual docket.

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:

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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 in person or by counsel on the argument, and in all other respects to be made parties to this proceeding.

Respectfully submitted,

/s/ David L. 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: August 15, 2019