

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

In the Matter of The Empire District Electric)
Electric Company, Liberty Utilities (Central) Co.)
and Liberty Sub Corp. Concerning an Agreement) EM-2016-0213
and Plan of Merger and Certain Related)
Transactions.)

**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 the Commission’s March 17, 2016 *Order Directing Notice and Setting Intervention Date*, and for its Application to Intervene respectfully states as follows:

1. The Midwest Energy Consumers Group is an unincorporated association of large users of electricity. Relevant to the immediate proceeding, MECG consists of large users of electricity taking service from Empire District Electric Company (“Empire”). Included in the members of MECG are Praxair, Inc., Walmart Stores, Inc; Jasper Products, LLC.; Tyson Foods, Inc.; and Simmons Feed Ingredients, Inc.

2. The matters to be considered in this case and the Commission’s determinations therein, may have a direct and significant impact on Applicants’ cost of energy service and the manner in which it is supplied. 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.

3. As large user customers of Empire, the Applicants have a direct and immediate interest in these proceedings that is different from that of the general public. While Applicants do 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 Applicants in these proceedings, Applicants ask that the Commission grant this Application for Intervention, and thereby entitle said Applicants 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: April 14, 2016