

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

In the Matter of The Empire District Electric)
Company’s Application for Approval of a)
Transportation Electrification Portfolio for)
Electric Customers in its Missouri Service Area) Case No. ET-2020-0390

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

COMES NOW the Midwest Energy Consumers Group (“MECG”), pursuant to 20 CSR 4240-2.075 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 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. Granting this proposed intervention to the Applicant should assist the Commission in development of a more complete record. As such, this intervention is in the public interest.

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.

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.

/s/ David L. Woodsmall
David L. Woodsmall

Dated: November 30, 2020