

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

In the Matter of The Empire District Electric            )  
Company’s Fuel Costs Related to the Extraordinary    )        Case No. EU-2021-0274  
Weather Event of February 2021                            )

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

COMES NOW the Midwest Energy Consumers Group (“Applicant” or “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 entity representing the interests of large users of electricity, gas and water.

2. On March 22, 2021, The Empire District Electric Company d/b/a Liberty (Liberty) filed an application requesting a variance from its Fuel Adjustment Clause tariff to allow it to delay its next Fuel Adjustment Rate filing that would otherwise be due by April 1, 2021. The matters to be considered in this case and the Commission’s determinations therein, could have a direct and significant impact on customers’ cost of energy service and the manner in which it is supplied. Therefore, granting this proposed intervention to the Applicant would serve the public interest and would assist the Commission in development of a more complete record.

3. As a representative of large user customers of Liberty, 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, it reserves 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:

David L. Woodsmall  
Woodsmall Law Office  
308 E. High Street, Suite 204  
Jefferson City, MO 65101  
(573) 797-0005  
[david.woodsmall@woodsmalllaw.com](mailto:david.woodsmall@woodsmalllaw.com)

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, and thereby entitle said Applicant to fully participate in this matter.

Respectfully submitted,



---

David L. Woodsmall, MBE #40747  
308 E. High Street, Suite 204  
Jefferson City, Missouri 65101  
(573) 797-0005  
[david.woodsmall@woodsmalllaw.com](mailto:david.woodsmall@woodsmalllaw.com)

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.

A handwritten signature in black ink, appearing to read "David L. Woodsmall". The signature is written in a cursive style with a large initial "D".

---

David L. Woodsmall

Dated: March 23, 2021