

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

In the Matter of The Empire	)	
District Electric Company's	)	
Submission of its 2013 Renewable	)	File No. EO-2013-0458
Energy Standard (RES)	)	
Compliance Plan	)	

**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 April 15, 2013, The Empire District Electric Company  
("Empire") filed its 2012 Annual Renewable Energy Standard Compliance  
Report pursuant to Public Service Commission Rule 4 CSR 240-20.100. The  
Commission opened Case No. EO-2013-0458 and on April 16, 2013, directed  
that notice be provided and that staff file a report of its review no later than  
May 30, 2013. The Order also directed that no later than May 30, 2013, the  
Office of the Public Counsel, and any other interested person or entity, may  
file comments regarding the report.

2. MDNR, and specifically its Division of Energy, is a state agency vested with the powers and duties set forth in § 640.150 RSMo. In addition, MDNR is tasked with certifying renewable energy resources pursuant to § 393.1025(5) 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 report and plans from a formal policy and planning perspective as well as looking at the potential impacts on environmental quality. MDNR has a specific interest in encouraging renewable energy sources.

4. MDNR has not determined the specific position it will take in this case; however, the Division of Energy has an interest in participating in this matter.

5. Counsel for MDNR has previously entered an appearance in this docket, but has been informed that access to Highly Confidential versions of filings in the Commission's Electronic Filing and Information System (EFIS) will not be authorized until MDNR has applied for intervention and been made a party to this case.

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

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with a copy to:

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WHEREFORE, MDNR respectfully requests that the Commission grant this Application to Intervene as soon as possible.

Respectfully submitted,

**CHRIS KOSTER**  
Attorney General

/s/ *Jeremy D. Knee*

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been transmitted by electronic mail to all counsel of record this 10th day of May 2013.

/s/ *Jeremy D. Knee*  
Jeremy D. Knee  
Assistant Attorney General