

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

In the Matter of The Empire District Electric)	
Company's 2013 Utility Resource Filing)	File No. EO-2013-0405
Pursuant to 4 CSR 240-22)	

MOTION OF RENEW MISSOURI FOR LEAVE TO INTERVENE

COMES NOW Earth Island Institute d/b/a Renew Missouri, and pursuant to 4 CSR 2402.075, hereby applies to intervene and become a party to the above-captioned case. In support of its motion to intervene, Renew Missouri states as follows:

1. Earth Island Institute is a non-profit corporation organized under the laws of California with its principal place of business at 2150 Allston Way, Suite 460, Berkeley, CA 94704. Earth Island has a Certificate of Authority for a Foreign Nonprofit granted by the Missouri Secretary of State. Renew Missouri is a registered fictitious name of Earth Island Institute under § 417.200, RSMo, with its principal place of business at 910 E. Broadway, Suite 205, Columbia, MO 65201. Renew Missouri is a non-profit policy group whose mission is to transform Missouri into a leading state in renewable energy and energy efficiency by 2016. Pleadings, notices and other correspondence concerning this matter should be addressed to the undersigned counsel.

2. Renew Missouri has an interest in the environmental, economic, business, and health benefits of energy efficiency and demand-side management (DSM) programs in Missouri. Renew Missouri's interests are different from those of the general public and could be adversely affected by a final order in this case. Renew Missouri is primarily interested in Empire's 2013 Integrated Resource Plan (IRP) because of the DSM Potential Study as well as the DSM portfolio analyses and measure screenings involved. Renew Missouri has previously been involved as a stakeholder in the negotiation and approval of the DSM portfolios of both Ameren Missouri and KCP&L Greater Missouri Operations pursuant to the Missouri Energy Efficiency Investment Act

(MEEIA). Renew Missouri anticipates becoming a stakeholder involved in the negotiation and approval of Empire's MEEIA plan, which is likely to be filed in the coming year.

3. Renew Missouri recognizes that the 30 days for intervention allowed by 4 CSR 240-2.075 have passed, but requests intervention in order to review the DSM Potential Study and initial DSM program measure screenings and provide input to the utility and other stakeholders. Renew Missouri has only recently gained the ability to engage as a stakeholder, having finalized a contract with a national energy efficiency expert consultant only after the 30 days allowed by 4 CSR 240-2.075 had passed.

4. Good cause exists to grant Renew Missouri late intervention. Renew Missouri and its energy efficiency expert have a unique perspective to bring that has not yet been represented in this case. Granting Renew Missouri leave to late intervene in this case will serve the public interest by assisting the Commission's record for decision in this case. No party will be adversely affected by such intervention, as Empire has not yet submitted its formal 2013 IRP filing.

WHEREFORE, Renew Missouri respectfully requests that the Public Service Commission grant its application to intervene.

Respectfully Submitted,



Andrew J. Linhares, # 63973

Staff Attorney

Renew Missouri

910 East Broadway, Ste. 205

Columbia, MO 65201

T: (314) 471-9973

F: (314) 558-8450

Andrew@renewmo.org

ATTORNEY FOR RENEW MISSOURI

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed on EFIS and delivered electronically to to all counsel of record on this 24th day of April, 2013.

A handwritten signature in black ink, appearing to read "Andrew Linhares", written over a horizontal line.

Andrew J. Linhares

