

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

In the Matter of the Petition of The Empire	)	
District Electric Company d/b/a Liberty to	)	
Obtain a Financing Order that Authorizes	)	File No. EO-2022-0193
the Issuance of Securitized Utility Tariff	)	
Bonds for Energy Transition Costs Related	)	
to the Asbury Plant	)	

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

COMES NOW, the Midwest Energy Consumers Group, (“MECG”) and pursuant to 20 CSR 4240-2.075, applies to intervene in the above case. For its Application, MECG states:

1. Midwest Energy Consumer’s Group (“MECG”) is an incorporated entity representing the interests of large commercial and industrial users of electricity.
2. On March 21, 2022, The Empire District Electric Company d/b/a Liberty (“Empire”) filed this petition for a financing order, seeking authority to issue securitized utility tariff bonds regarding the retired Asbury generating plant. The matters to be considered in this case and the Commission’s determinations thereon, could have a direct and significant impact on the cost of electric service of large commercial and industrial customers.
3. As a representative of large user customers of Empire, the MECG has a direct and immediate interest in these proceedings that is different from that of the general public. While MECG does not at this time have sufficient information to assert a position on this petition, 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. MECG's intervention will serve the public interest by assisting the record for the Commission's decision in this case.

5. Pleadings, notices, and other correspondence in this case should be directed to undersigned counsel.

WHEREFORE, MECG respectfully requests that the Commission issue its order granting its Application to Intervene and that it be made a party hereto with all rights to participate in this matter.

Respectfully,

**/s/ Tim Opitz**

Tim Opitz, Mo. Bar No. 65082

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ATTORNEY FOR MIDWEST  
ENERGY CONSUMERS GROUP

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 22<sup>nd</sup> day of March 2022:

**/s/ Tim Opitz**

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