

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

In the Matter of The Empire District Electric)	
Company's 2019 Triennial Compliance Filing)	<u>File No. EO-2019-0049</u>
Pursuant to 4 CSR 240-22)	

**APPLICATION TO INTERVENE
OF THE
MISSOURI JOINT MUNICIPAL ELECTRICAL UTILITY COMMISSION**

COMES NOW, the Missouri Joint Municipal Electric Utility Commission ("MJMEUC"), pursuant to Missouri Public Service Commission ("Commission") rule 4 CSR 240-2.075 and this Commission's July 2 *Order Directing Notice and Setting Date for Submission of Intervention Requests*, and files its timely Application to Intervene. In support thereof, MJMEUC states as follows:

1. The MJMEUC is a body corporate and politic of the State of Missouri, organized as a joint municipal utility commission pursuant to section 393.700 *et seq.* RSMo., with authority to exercise public powers of a political subdivision of the state for the benefit of the inhabitants of municipalities jointly contracting to establish the MJMEUC. Sixty-eight Missouri municipalities are current parties to the joint contract establishing the MJMEUC.

2. MJMEUC represents the interests of municipal electrical systems throughout the state, including municipal electrical systems that take transmission through the Southwest Power Pool, of which Empire is a member. As such, MJMEUC has an interest that is different from that of the general public and which may be adversely affected by a final order arising from this case. Such interest is not currently represented in the proceedings.

3. MJMEUC does not yet have a position on the issues in this case and reserves the right to take positions on specific issues as this case proceeds.

4. Granting intervention to MJMEUC would serve the public interest by allowing MJMEUC's experience and insight to be part of the Integrated Resource Planning process.

5. No party will be prejudiced by MJMEUC's intervention.

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

WHEREFORE, MJMEUC requests that it be permitted to intervene and be made a party to this case for all purposes, and for such other orders and relief as may be appropriate in the circumstances.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 3rd day of July, 2019, to all parties on the Commission's service list in this case.

/s/ Terry M. Jarrett